

PERMIT ATTACHMENTS

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ATTACHMENT 1
DESCRIPTION AND DESIGN AND OPERATION OF THE FACILITY

1.1 HIGHLIGHTS

The Safety-Kleen Systems, Inc. Service Center, Albuquerque New Mexico (Safety-Kleen) hazardous waste storage facility (Facility) is located at 2720 Girard Boulevard NE, in the City of Albuquerque, Bernalillo County, New Mexico.

The Facility consists of four active permitted areas. These are the East Container Storage Unit, the West Container Storage Unit, the Flammable Storage Building, and the 12,000-gallon spent solvent underground storage tank with associated secondary containment. The Site Plan, Figure 1, and photographs 1 through 6, located in Attachment 1-1, show the location of the various units comprising the Facility. The Site Plan is located in Attachment 1-1. The Facility has been in operation since March 1, 1977.

1.2 LEGAL DESCRIPTION

The legal description of the property is as follows:

The Facility is located in the Southwest quarter of the Northeast quarter of Section 10, T10N, R3E, as filed in the Bernalillo County Clerk's Office on March 28, 1962.

1.3 FACILITY DESCRIPTION

The Facility consists of approximately 1.05 acres containing a 2,500 square foot building consisting of offices, restrooms, a sales representative room and the East and West Container Storage Units (CSUs), two 12,000-gallon underground double-walled storage tanks for clean and used solvent, one enclosed flammable storage building used for container storage, and one loading dock containing a solvent return and fill station, and secondary containment. The Facility is designed to control run-on and run-off.

The Albuquerque Facility is an accumulation point for used solvents generated by Safety-Kleen customers, the majority of whom are small quantity generators. All wastes are ultimately shipped to a Safety-Kleen recycling facility or a contract reclaimer and then returned to the Company's customers as product.

Figures 2 through 9 of Permit Attachment 1-1 illustrate the general Facility location map, topographic maps, zoning maps,

Flood Insurance Rate Map, drinking water and sanitary sewer utility locations, and the Facility wind rose.

1.4 REGIONAL DESCRIPTION

The Facility is located approximately one mile northwest of Carlisle Boulevard NE and State Road 40 in Bernalillo County. This area is zoned for manufacturing use, and to the best of Safety-Kleen's knowledge, no easements or title, deed, or usage restrictions exist which may conflict with operations at the site.

Albuquerque is bordered by the 11,000 acre Cibola National Forest to the east and the Canocito Navajo Indian Reservation to the west. The total population of Albuquerque and surrounding areas in Bernalillo, Sandoval, and Valencia counties is about 350,000. The climate in this area is an arid, continental climate. Rainfall varies, but in the vicinity of the service center, average annual precipitation is 7 to 10 inches. Average snowfall is about 10 inches. The average temperature in winter is approximately 38 degrees F and 74 degrees F in Summer. Winds blow from the north in winter and from the south in summer. The average annual wind speed is 9 miles per hour.

Albuquerque is located in the Rio Grande Valley, and is bordered on both sides by mesas rising about 5,000 feet. The elevation at the service center is approximately 5,100 feet. The service center is not within a 100-year flood plain.

The soil in the vicinity of the service center is the Wink Series. These deep, well-drained soils are formed in unconsolidated alluvium but have been modified byolian erosion. The slopes are generally 0 to 1 percent in the area of the service center. The surface layer is a brown, fine sandy loam.

The Albuquerque Service Center receives its water from the City of Albuquerque, which also maintains a sanitary sewer line on Girard Boulevard. Drainage in this area is by way of a series of diversion channels. The North Diversion Channel is directly east of the service center.

No known oil or gas wells exist within one-quarter mile of the site and it is not located in or near a wetland or critical habitat. No schools, parks or hospitals exist within one-quarter mile of the facility. There are no known drinking water wells within one-quarter mile of the site.

The non-building areas of the facility are paved with asphalt, gravel or concrete as noted on the site plan (Figure 1). The majority of the vehicular traffic and loading/unloading

operations occur at and near the return and fill station and this area is paved with asphalt and concrete. The entrance to the facility is on Girard Boulevard, which is the major access road to the facility. The access road was designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the manufacturing activities in this area. The route vans that daily travel the routes between the service center and its customers use the two-lane approach driveway.

1.5 SEISMIC COMPLIANCE

Although Bernalillo County is listed in Appendix VI of the New Mexico Hazardous Waste Management Regulations 20.4.1.500 NMAC (incorporating 40 CFR 264.18 (a)), Safety-Kleen is not required to demonstrate compliance with the seismic standard found in the New Mexico Hazardous Waste Management Regulations 20.4.1 NMAC since there are no new portions of the Facility where treatment, storage, or disposal of hazardous waste will be conducted.

1.6 FLOODPLAIN STANDARDS

Referring to the provided 100-year flood plain map, the Safety-Kleen facility is not located within an area subject to a 100-year flood. A copy of the map used for this determination is shown in Attachment 1-1.

1.7 DISCLOSURE

As required by the New Mexico Hazardous Waste Act (HWA) 74-4-4.7, Safety-Kleen Systems, Inc., filed a disclosure statement with the New Mexico Environment Department (NMED) with the information required by, and on a form developed by, the NMED in cooperation with the New Mexico Department of Public Safety (DPS). A copy of the letter from DPS to NMED regarding the background investigation conducted on Safety-Kleen Systems, Inc., is included in Attachment 1-2.

1.8 DESCRIPTION OF PERMITTED UNITS AT THE FACILITY

1.8.1 Container Storage Units

There are three container storage units (CSUs) located at the Facility. A description of each unit follows. All square footage approximations were taken from CSU measurements on Figure 1.1.

The container storage configuration is shown in Attachment 1-3. Proper aisle space shall be maintained pursuant to 20.4.1.500 NMAC (incorporating 40 CFR 264.35). Containers shall be stored no more than two high and shall be placed on pallets and transported with a forklift or pallet jack.

1.8.1.a East Container Storage Area

The East Container Storage Area is an active container storage unit specifically designed to store hazardous waste for transport off-site located within the main building. It comprises an area of approximately 480 square feet and has a storage capacity of 2,680 gallons. The East Container Storage Area is used for the storage of spent immersion cleaner, aqueous parts washer solvents, and dry cleaning waste. Non-hazardous material, wastes that are not regulated under RCRA (including transfer wastes), and Safety-Kleen products may also be stored in this area. The wastes stored in the CSUs are not handled while on site, are segregated, and are labeled to indicate their contents.

The East Container Storage Area is also equipped with secondary containment sized to contain 10% of the volume of containers in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.175(b)(3)). The secondary containment is in the form of six-inch wide by four-inch high steel-reinforced concrete curbs, which have been poured so that no cracks or gaps exist, and two collection trenches with a combined collection trench capacity of 268 gallons.

The maximum quantity of hazardous waste stored in the East Container Storage Area shall be no more than 2,680 gallons in 9-gallon and 55-gallon containers except for 85-gallon overpack drums. Container specifications are located in Attachment C-1. The Permittee shall use containers that comply with the requirements of the United States Department of Transportation shipping container regulations (*49 CFR §173, Shipper's General Requirements for Shipment and Packaging*, and *49 CFR §178, Specifications for Packaging*) for management and storage of hazardous waste at the CSU.

1.8.1.b West Container Storage Area

The West Container Storage Area is an active container storage unit specifically designed to store hazardous waste for transport off-site located within the main building. It comprises an area of approximately 575 square feet and has a storage capacity of 4,310 gallons. The West Container Storage Area is used for the storage of spent immersion cleaner, aqueous parts washer solvents, photo imaging wastes, and dry cleaning waste. Non-hazardous material, wastes that are not regulated under RCRA (including transfer wastes), and Safety-Kleen products may also be stored in this area. The wastes stored in the CSUs are not handled while on site, are segregated, and are labeled to indicate their contents.

The West Container Storage Area is also equipped with secondary containment sized to contain 10% of the volume of containers in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.175(b)(3)). The secondary containment is in the form of six-inch wide by four-inch high steel-reinforced concrete curbs, which have been poured so that no cracks or gaps exist with a capacity of 431 gallons.

The maximum quantity of hazardous waste stored in the West Container Storage Area shall be no more than 4,310 gallons in 9-gallon and 55-gallon containers except for 85-gallon overpack drums. Container specifications are located in Attachment C-1. The Permittee shall use containers that comply with the requirements of the United States Department of Transportation shipping container regulations (*49 CFR §173, Shipper's General Requirements for Shipment and Packaging*, and *49 CFR §178, Specifications for Packaging*) for management and storage of hazardous waste at the CSU.

1.8.1.c Flammable Storage Building

The Flammable Storage Building is an active container storage unit specifically designed to store hazardous waste for transport off-site. It comprises an area of approximately 1,240 square feet and has a storage capacity of 9,650 gallons. The Flammable Storage Building is used for the storage of dumpster sediment, paint wastes, aqueous parts washer solvents, and other products as necessary, such as DOT hazard class 3 and containerized materials with the proper shipping description, "combustible liquid, nos". The wastes stored in the CSUs are not handled while on site, are segregated, and are labeled to indicate their contents.

The Flammable Storage Building is also equipped with secondary containment sized to contain 10% of the volume of containers in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.175(b)(3)). Coated floors, poured so that no cracks or gaps exist, slope to three collection trenches provide secondary containment. The three collection trenches have a combined capacity of 965 gallons.

The maximum quantity of hazardous flammable waste stored in the Flammable Storage Building shall be no more than 9,650 gallons in 9-gallon and 55-gallon containers except for 85-gallon overpack drums. Container specifications are located in Attachment C-1. The Permittee shall use containers that comply with the requirements of the United States Department of Transportation shipping container regulations (*49 CFR §173, Shipper's General Requirements for Shipment and Packaging*, and *49 CFR §178,*

Specifications for Packaging) for management and storage of hazardous waste at the CSU.

1.8.1.d Additional Container Information

Run-on into the containment system is prevented by the following: the storage areas with containment systems are bermed and are inside the enclosed main building and flammable storage building, thus preventing any rain from entering the storage areas.

If a spill occurs, Safety-Kleen shall evaluate and clean up the spill in as timely a manner as possible to prevent further contamination and overflow of the containment system. The fact that the floors in the storage areas are sloped towards the aisles allows a spill or leak to be detected quickly.

Safety-Kleen shall store all ignitable and reactive wastes as well as all other wastes, in the Flammable Storage Building. This CSU shall be located more than 50 feet away from Safety-Kleen's property line in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.176). All storage containers holding hazardous waste that is incompatible with other wastes or materials shall be separated and protected from these wastes or materials by means of a dike, berm, wall, or other device as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.177).

Additional safety precautions for the handling of containers are as follows:

1. All containers holding hazardous materials to be stored at Safety-Kleen's Facility shall be inspected prior to acceptance to insure proper condition of the container and compatibility of materials with container. Any container not meeting these criteria shall have its contents transferred to an appropriate container at that time in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.171).
2. A container holding hazardous waste shall not be handled or stored in a manner, which may cause it to leak, shall always be closed during storage, and shall only be opened to add or remove waste as necessary in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.173).
3. Unless the proper precautions are taken to prevent reactions pursuant to 20.4.1.500 NMAC (incorporating 40 CFR 264.177) no incompatible wastes shall ever be placed in the same container. Furthermore, no waste

combinations that cause the following reactions may be placed in the same container:

- a. Generate extreme heat or pressure, fire or explosions, or violent reactions;
 - b. Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health or the environment;
 - c. Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;
 - d. Damage the structural integrity of the Facility; and
 - e. Through other like means threaten human health or the environment.
4. Hazardous waste shall not be placed in unwashed containers that previously held an incompatible waste or material as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.177(b)). Other preventive measures are described in Attachment 6, *Preparedness and Prevention*.

1.8.2 12,000-Gallon Spent Solvent Underground Storage Tank/ Return and Fill Station

The 12,000-gallon, double-walled, spent solvent underground storage tank is 8 feet in diameter and 32.5 feet long. It is constructed of 1/4" thick carbon steel and is double walled with an installed leak detection system in the interstitial space. The outside of the tank is coated with a plastic-fiberglass mixture so that no metal is exposed and the tank is isolated from electrical currents. The tank is constructed in accordance with the Underwriters Laboratories Standard 58 and is located more than 5 feet from the building foundation as required by the National Fire Protection Association requirements. A liquid sensing leak detector is located between the tank walls and shall be checked each operating day.

A manually controlled waste-feed cut-off valve located adjacent to the wet dumpsters at the return and fill station can prevent the tank from being overfilled. The tank is equipped with an aural (siren) and visual (strobe light) high-level alarm system, which will alert employees when the tank is approximately 600 gallons from being full which is when the pump automatically shuts off. The pump on the tanker truck can be turned off

immediately if the alarm sounds when filling the product solvent tank. A manual button can be used to test the alarm to insure the system is fully operational. The fill pipes are secondarily contained to prevent spills during loading and unloading operations.

Cathodic protection has been installed for the carbon steel/FRP-coated composite tank. A copy of the report by the independent corrosion expert who designed the cathodic protection system for the tank and supervised its installation is included in Attachment 1. A description of the high level alarm system, leak detection system, and installation documentation is provided in the report.

Ancillary equipment to the spent solvent underground storage tank includes a return and fill shelter containing two enclosed dumpster/drum washers into which the contents of a drum of used solvent can be emptied. A float switch controls a pump that moves excess solvent to the spent solvent tank. When the tank is empty, solvent in the bottom of the main cabinet is re-circulated through the drum washer for any remaining drum cleaning requirements. All spent solvents and sediments are then pumped into the spent solvent tank. The return and fill station is concrete block structure with a metal roof and is equipped with a monolithically poured concrete secondary containment with a capacity of 1,548 gallons. Elevated grating is situated above the containment area.

Piping to the underground storage tank from the return and fill station is tight-piped, underground, and the joints are welded to minimize the potential for leaks. The underground used solvent piping is provided with secondary containment in the form of a high-density polyethylene pipe jacket.

Secondary containment for the underground spent solvent storage tank consists of the double-walled tank.

Additional secondary containment requirements for the spent solvent underground storage tank and related appurtenances are as follows:

1. The secondary containment system must be installed, designed, and operated to prevent the migration of wastes or accumulated liquid out of the system to the soil, ground water, or surface water at any time during the use of the tank system, and capable of detecting and collecting releases and accumulated liquids until the collected material is removed in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.193(b)(1) and (2)).

2. The secondary containment system shall be provided with a leak detection system that is designed and operated so that it will detect the failure of either the primary or secondary containment structure or the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours, or at the earliest practicable time if the owner or operator can demonstrate to the Secretary that existing detection technologies or site conditions will not allow detection of release within 24 hours pursuant to 20.4.1.500 NMAC (incorporating 40 CFR 264.193(c)(3)).
3. The secondary containment system shall sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills, or precipitation. Spilled or leaked waste and accumulated precipitation shall be removed from the secondary containment system within 24 hours, or as timely a manner as is possible to prevent harm to human health and the environment if the owner or operator can demonstrate to the Secretary that the removal cannot be accomplished within 24 hours in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.193(c)(4)).
4. Ancillary equipment shall be provided with secondary containment meeting the requirements of 20.4.1.500 NMAC (incorporating 40 CFR 264.193(b) and (c)), pursuant 20.4.1.500 NMAC (incorporating 40 CFR 264.193(f)(1) through (4)), except for:
 - a. Above ground piping visually inspected daily for leaks;
 - b. Welded flanges, welded joints, and welded connections visually inspected daily for leaks;
 - c. Seal-less or magnetic coupling pumps and seal-less valves visually inspected daily for leaks; and
 - d. Pressurized above ground piping systems with automatic shut off devices visually inspected daily for leaks.

ATTACHMENT 1-1

FACILITY MAPS AND PICTURES

ATTACHMENT 1-2

PERSONAL HISTORY DISCLOSURE LETTER

ATTACHMENT 1-3

CONTAINER STORAGE UNIT LAYOUT

ATTACHMENT 2
AUTHORIZED WASTES AND PART A APPLICATION

| Hazardous Waste Number | Description of Hazardous Waste | Maximum Amount (gallons per year) |
|-------------------------------|---|--|
| | D-listed Wastes: Characteristic Hazardous Wastes | |
| D001 | Spent Solvents, which may include the following: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043 | 143,000 |
| D001 | Tank Sediment | 3,000 |
| D001 | Spent (Used) Immersion Cleaner and aqueous used solvent | 3,000 |
| D001 | Dry Cleaning Waste (quantity included in F002) | |
| D001 | Paint Waste (quantity included in F003) | |
| D011 | Photo Chemical Wastes | 3,000 |
| | | |
| | | |
| | F-Listed Wastes: Hazardous wastes from Non-specific sources. | |
| F002 | Spent halogenated solvents, Dry Cleaning Waste | 6,000 |
| F003 | Non-halogenated spent solvents, Paint Waste | 14,000 |
| F005 | Non-halogenated spent solvents, Paint Waste (quantity included in F003) | |

ATTACHMENT 3

WASTE ANALYSIS PLAN

3.1 INTRODUCTION

The Waste Analysis Plan (WAP) was provided to the New Mexico Environment Department by Safety-Kleen Systems Inc., (Safety-Kleen, Facility) in accordance with the requirements of the New Mexico Hazardous Waste Management Regulations, 20.4.1.900 NMAC (incorporating 40 CFR 270.14(b)(2) and (3)) and Permit Condition 2.5.

The Facility shall store only wastes it is authorized to store. That is, Safety-Kleen will only store wastes included in Part A of the application for hazardous waste permit and not otherwise prohibited by the permit. Safety-Kleen will not store any hazardous waste for more than one year.

Annual Waste Characterization data for the waste streams are located in Attachment 3-1. These waste streams are characterized annually as described in the "Statistical Analysis of Annual Waste Characterization Data", attached and incorporated herein by reference. The testing and sampling methodology is as described in Section 3.5. The data generated in this process is used to assign waste codes, if any, for each waste stream. The data generated in the annual recharacterization (AR) is also used to assist recycle centers in recycling or treating the waste streams. Recycle centers also rely on their own waste analysis plans to generate data to recycle materials and or dispose of waste. If while providing service to a customer if there is suspicion that the waste does not meet the acceptance criteria, the waste will not be picked up and the customer must provide information explaining what is in the waste and how the waste was adulterated.

Providing service to Safety-Kleen customers is dependent on a review of the customer business. If the business is a typical generator of that waste stream (for example, a garage generating parts washer waste), then limited review is performed. If the business is not a typical generator of that waste stream or if the business has other processes on site, a more detailed review of the business is performed and a certification from the customer is required stating the waste will be as described without adulterants. For example, laboratory analysis of that customer's waste may be required.

In this AR process, regulated hazardous constituents and reasonably expected underlying hazardous constituents (UHC)s are also discovered. Underlying Hazardous Constituents discovered in the AR shall be assumed to be expected throughout the waste

stream. Safety-Kleen's Underlying Hazardous Constituents for current year are contained in Attachment 3-1. The applicable constituent concentration or technology based treatment standards for the wastes and/or individual hazardous constituents will be identified, if required by regulation, on the Land Disposal Regulation (LDR) form generated from this data, an example of which is provided in Attachment 3-2. The LDRs generated in this process also identify whether the waste must be treated before being land disposed when required by regulation.

Annual recharacterization data is also used to update subpart BB and Subpart CC compliance plans. It is anticipated that minor changes in the waste streams are unlikely to significantly change in air emissions.

Recycle centers shall test every shipment of waste for PCBs. If a shipment is discovered to contain PCBs, the source of the PCBs is traced and appropriate 40 CFR 761 requirements are implemented. Any equipment contaminated by PCBs is removed from service decontaminated cleaned before being put into service.

The Safety-Kleen transportation department is responsible for selecting packaging for Safety-Kleen waste streams, in addition to their responsibility for company compliance with Federal, State, and Local transportation regulations and rules. The transportation department has selected packaging based on past waste recharacterizations and continues to review AR and other data to maintain compliance with material packaging requirements.

The Waste Analysis Plan also provides information about how Safety-Kleen plans to accept, manage, and store hazardous wastes at their Albuquerque, New Mexico, Service Center (Facility) in order to meet the requirements of the New Mexico Hazardous Waste Management Regulations 20.4.1 NMAC (incorporating 40 CFR 260 through 40 CFR 270). The WAP shall be included in the operating record that Safety-Kleen shall keep on-site in the Administration Office. The wastes that Safety-Kleen shall be accepting for storage and subsequent transfer to a Safety-Kleen recycling facility or a contract re-claimer are listed in Permit Attachment 2, *Authorized Wastes and Part A Application*.

Table 3-1 Waste Analysis Plan, Abstract

| Waste Description | EPA Hazardous Waste Numbers | Capacity ¹ | Annual Amount ² |
|--------------------------------|-------------------------------|---------------------------------------|----------------------------|
| Spent Solvents | D001 ³ | 12,000 | 143,000 |
| Bottom Sediment from Tank | D001 ³ | N/A | 3,000 |
| Spent (used) Immersion Cleaner | D001 ³ | 6,990 | 3,000 |
| Used Solvent (aqueous) | See Note 3 | Included with spent immersion cleaner | 3,000 |
| Dry Cleaning Waste | D001, F002 ³ | Included with spent immersion cleaner | 6,000 |
| Paint Waste | F003, F005, D001 ³ | 9,650 | 14,000 |
| Photo Chemical Wastes | D011 | Included with spent immersion cleaner | 3,000 |

Notes: 1. The facility capacity is in gallons.

2. The annual amount is in gallons.

3. May also include D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043.

The total amount of drummed waste shall not exceed 16,640 gallons in the three Container Storage Units at any one time.

3.2 DESCRIPTION OF WASTES

Several types of waste result from the servicing of Safety-Kleen customers and the maintenance of the service center. It should be noted that the solvents managed at this facility are incompatible with strong oxidizers and reactive metals, none of which are present in the containers, container storage area, or

the concrete sealant. The solvents are also compatible with one another. Analytical data for the wastes and specifications for the products are located in Attachments 3-1 and 3-2. Qualitative descriptions of the acceptable wastes are identified in Sections 3.3.1 through 3.3.4.

3.2.1 Wastes Resulting from the Parts Washer Service

Used solvents from parts washers are accumulated in a 12,000-gallon underground, storage tank via the return and fill station. Containers of used material are poured into a dumpster at the return and fill station which in turn empties into the tank. This waste handling method results in several types of solvent waste as described below:

3.2.1.a Used Solvent

The used solvent is removed from the tank by a tanker truck on a scheduled basis. About 5,000 gallons are removed every month. This waste is ignitable (D001) and may exhibit the toxicity characteristic of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040 D041, D042, and D043.

3.2.1.b Bottom Sediment in the Tank

Approximately once every two years, it is necessary to remove sediment and other heavy material from the bottom of the tank. A Safety-Kleen vacuum truck is generally used for this purpose. The sediment is ignitable (D001) and may exhibit the toxicity characteristic of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040 D041, D042, and D043.

3.2.1.c Dumpster Sediment

Sediment may also accumulate in the drum washers in the return/fill station. The sediment is manually removed and placed in containers. The dumpster sediment is representative of the waste codes described in items 3.2.1.a and 3.2.1.b above.

3.2.1.d Used Aqueous Parts Cleaning Solvents

This waste may be bulked at the service center into containers that meet DOT specifications or may be co-mingled with the other solvent into the used solvent tank. It may be toxic using the toxicity characteristic of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027,

D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040 D041, D042, and D043.

3.2.1.e Immersion Cleaner

Immersion cleaner is a different type of solvent that is not placed in the underground storage tank. Containers of immersion cleaner typically remain in the drum in which it was originally used until it is received at the recycle center. Drums are placed in the drum storage area of the warehouse and are stacked

The immersion cleaner is a non-halogenated hydrocarbon mixture and may exhibit the toxic characteristics of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040 D041, D042, and D043.

3.2.2 Wastes Resulting from the Dry Cleaner Service

Dry cleaning wastes consist of used filter cartridges, powder residue from diatomaceous or other powder filter systems and still bottoms. These wastes are packaged on the customer's premises in containers meeting DOT specifications. The containers are then palletized, stacked two-high and placed in the East or West Container Storage Areas of the warehouse. Approximately 95% of the dry cleaning solvent used is perchloroethylene (F002 and D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040 D041, D042, and D043) and the remaining 5% is trichlorotrifluoroethane (F002) and toxic using the characteristic leaching procedure (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043).

Other types of dry cleaning wastes (e.g. freon) will be managed on a transfer basis only.

3.2.3 Paint Wastes

Paint wastes consist of various lacquer thinners (D001, F003, and F005) and may be toxic as per the characteristic leaching procedure (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). The wastes are collected in containers which meet DOT requirements at the customer's place of business and containers are then palletized and stored in an enclosed concrete masonry building (the Flammable Storage Building).

3.2.4 Photographic/Imaging Wastes

Some photographic imaging wastes managed by the facility are not solid wastes per 20.4.1.200 NMAC (incorporating 40 CFR 261.2(c)) because their hazardous constituent is reclaimed. Others are managed under the provisions of Subpart F of 40 CFR 266 - Recyclable Materials Utilized for Precious Metals Recovery. Imaging waste consists typically of three waste streams. Photo fixer solution is an aqueous solution used to etch photo film during processing. This material is characteristic for silver (D011). Safety-Kleen is able to recover the silver from the solution. Used Photo developer is an aqueous solution that exhibits no hazardous waste characteristics but may not be allowed to discharge into public wastewater treatment systems in some communities. Silver collection canisters are sent to a recycle center for reclamation. These canisters do not meet the definition of a hazardous waste as per 20.4.1.100 NMAC (incorporating 40 CFR 260.30(c)) and are managed as a non-regulated material.

3.3 QUALITY CONTROL PROCEDURES

The used solvents are the primary feed stocks for the generation of Safety-Kleen solvent products. As a result, quality control of the used solvents is necessary to ensure that reclamation occurs in the safest and most efficient manner possible. The Albuquerque service center collects used solvents from approximately 1,100 customers, most of who are small quantity generators, and an estimated 14,000 drums containing recoverable solvents are returned to the service center each year for shipment to a reclaimer. With such large numbers of waste generators and waste shipments, performing detailed analyses at the service center is economically and logistically infeasible.

All the materials collected at the service center are managed at all times in a closed loop system and are usually collected from a company with a single process. The composition and quality of these materials are known and Safety-Kleen's operating experiences have shown that the collected materials rarely deviate from company specifications. As an additional safeguard, Safety-Kleen personnel are instructed to inspect all materials before returning them to the service centers as described in Section 3.3. This mode of operation has been proven to safeguard the recycling process and maintain a quality product.

However, in accordance with 20.4.1.500 NMAC (incorporating 40 CFR (a)(3)(i)), Safety-Kleen will perform physical and chemical analysis of a waste stream when it is notified or has reason to believe that the process or operation generating the waste has changed, or when the result of inspection indicates that the

waste collected does not match that designated. It is Safety-Kleen's practice that suspected non-conforming material must not be accepted until a full analysis has been conducted. If a container with questionable contents is returned to the service center, a sample will be taken and analysis will be performed at the recycling center, Safety-Kleen Tech Center (Elk Grove Village, Illinois) or other qualified lab according to the procedures outlined in Section 3.4 of this attachment. The Branch Manager will be notified of any contamination that may have occurred.

3.3.1 Quality Control Training

Safety-Kleen trains personnel to verify the physical characteristics of the wastes at several points in the management of the solvent. These procedures are described briefly below:

Safety-Kleen controls the use and management of its solvents by:

1. Limiting the solvents stored to those compatible with one another and their containers;
2. Limiting the uses of each type of solvent for (example, dry cleaning waste is only collected from dry cleaner shops);
3. Determining the customer's type of business (i.e., the SIC code is recorded) and the purpose for which the customer will use the machine;
4. Training customers to use the machines properly;
5. Training employees to inspect the physical characteristics of used solvent and determine whether it is acceptable;
6. When waste is collected from a customer, indicate on the service document whether the used solvent meets Safety-Kleen's acceptance criteria;
7. Marking each container with the customer's name, address, and EPA I.D. number (if available). This information remains on containerized waste until it is accepted at the reclamation facility;
8. Keeping a record of each incoming and outgoing shipment in the operating log; and

Safety-Kleen's customers sign a service document containing the following information:

1. The name, address and EPA I.D. number of the facility to which the waste is being shipped;
2. The customer's name, address and EPA I.D. number (if available); and
3. The description and amount of Safety-Kleen solvent waste generated.

In addition, each incoming and outgoing shipment is recorded in the facility's operating log.

If a waste is rejected at the time of service, the customer will be given a choice as to whether he will dispose of the waste himself or require Safety-Kleen's assistance. If he requests Safety-Kleen's assistance, a sample will be drawn using a Coliwasa tube or similar sampling device to ensure representative samples. The sample will be analyzed for flash point and volatile organic compounds. If this analysis does not adequately define the constituents, additional analyses will be performed as necessary (e.g., semi-volatile organic compounds, PCBs, etc.).

The laboratory sends waste analyses results to the service center. If through the additional analysis the waste is determined to be acceptable at the branch, it will be relabeled, manifested and then managed with the other wastes. If it is determined through the additional analysis to not be acceptable, the waste will either be: (a) managed at the Service Center on a 10 day transfer basis and manifested to a properly permitted reclamation or disposal facility, or (b) manifested and shipped directly to a properly permitted reclamation or disposal facility. The analytical results from the additional characterization analysis will be used to appropriately manage the waste. The Branch Manager has the right to refuse any further service to a business which has returned waste that does not meet acceptable criteria

3.3.2 Qualitative Waste Analysis

3.3.2.a General Inspection Procedures

See Attachment 3-3 for inspection training details.

1. Safety-Kleen visually inspects each drum of waste when it is collected at the customer's location. Safety-Kleen examines the waste for volume, appearance, consistency and odor and is intimately familiar with the characteristics of the waste it receives. Based on the known waste characteristics, Safety-Kleen has established the specific acceptance criteria set forth

below, to be used by Safety-Kleen personnel in their visual inspections. These inspection procedures allow Safety-Kleen to ensure that the waste being picked up meets appropriate acceptance criteria.

2. If a particular drum of waste does not meet the acceptance criteria, the Safety-Kleen service representative will either (1) sample the waste for testing at a Safety-Kleen laboratory to determine whether the waste has been contaminated; or (2) reject the waste. In the event the waste is not sampled, Safety-Kleen will notify the generator's State Agency that is authorized to implement the RCRA hazardous waste management program (or EPA if the RCRA program has not been delegated to the State).
3. If the waste is sampled for further analysis, the service representative will collect a sample, then seal the drum and label it as hazardous waste. The drum is left with the customer pending the results of the laboratory tests. The laboratory testing initially involves analyzing the suspect waste for flash-point and the presence of volatile organic compounds. Pending those results, additional constituents may also be analyzed. The costs of any sampling and testing performed as a result of the waste failing to meet the acceptance criteria, will be borne by the customer.
4. If the laboratory analysis reveals that the sampled waste is not contaminated, Safety-Kleen will accept the waste from the customer. If the laboratory confirms that the waste is contaminated, the generator will be responsible for securing an alternate means of disposal or they may contract with Safety-Kleen to handle the waste on a ten-day transfer basis.

3.3.2.b Waste Specific Criteria

The following is a description of the specific acceptance criteria for each waste stream.

3.3.2.b.i Used Solvent

1. The acceptance criteria for determining by visual inspection whether used solvent has been contaminated are volume, odor and color, the most significant of which is volume. If the volume of waste in a given drum exceeds the specified level, the Safety-Kleen service representative will conduct an inquiry of the customer's operation and handling procedures.

Contingent on the customer's responses, the solvent may be accepted, a sample of the waste may be collected for laboratory testing as described above, or the waste may be rejected.

2. In addition to the volume criterion, the odor of the used solvent may typically indicate whether the waste has been contaminated. Used solvent has a distinctive odor. The service representatives are expressly instructed not to deliberately sniff the waste. However, if the solvent has been contaminated the service representative may notice a difference in the odor when he services the machine.
3. The used solvent is also visually inspected for its color. Unused solvent typically has a clear or greenish tint. As the solvent is used, it turns brown in color. The more it is used, the darker brown it becomes, until it is almost black. In the case of a print shop, the solvent may be clear, green, brown, black, or many colors. Therefore, if the used solvent does not appear to be the expected color, the service representative will sample the waste for possible contamination as described above, or will reject the waste.

3.3.2.b.ii Immersion Cleaner

1. The criteria for the inspection of used immersion cleaner are volume and color. If the volume of waste exceeds the specified level a sample will be tested for contamination following the procedures described above or the waste will be rejected.
2. Unused immersion cleaner is amber in color. As the solvent is used, it turns brown in color. The more it is used, the darker brown it becomes, until it is almost black. If the used immersion cleaner does not appear to be the expected color, the service representative will either sample the waste for possible contamination as described above, or reject the drum of waste.

3.3.2.b.iii Dry Cleaner Wastes

Dry cleaner wastes normally consist of used filter cartridges, powder residue, and still bottoms.

1. Used Filter Cartridges:

Used filter cartridges are placed in containers meeting DOT specifications. It is obvious to the service representative whether the items in the drums are filter cartridges. The drums may also contain approximately one inch of liquid which should either be clear or have a light brownish tint. If the amount of the liquid is greater than approximately one inch or if the liquid is a color other than light brown, the service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste.

2. Powder Residue:

The criteria for the acceptance of powder residue are consistency and color, the former being the more significant criterion of the two. A drum of powder residue should not contain any liquid. As the name implies, it will be dry or "powdery". If there is any liquid in the drum, the waste will be sampled for contamination in accordance with the procedures described above, or the waste will be rejected.

The powder residue is also inspected for color and should appear to be grayish-black. If the residue is not grayish-black in color, the service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste.

3.3.2.b.iv Still Bottoms

The criteria for the acceptance of dry cleaning still bottoms are consistency and color. The waste should have a highly viscous, tar-like consistency. If the consistency of the waste is too thin or if there is more than one inch of free liquid in the drum, the waste will be sampled for contamination in accordance with the procedures described above, or will be rejected.

In addition to consistency, the still bottom waste is inspected for color. The waste should appear dark brown or black in color. If the waste is a different color, a service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste.

3.3.2.b.v Paint Wastes

Safety-Kleen handles both lacquer thinner waste generated from the paint gun cleaning process and paint waste.

1. Lacquer Thinner Waste:

The significant criterion for determining whether lacquer thinner waste will be accepted is volume. The solvent is provided to customers in pails which meet DOT requirements. The paint gun cleaning machine operates as a closed system where by there should never be a combined volume of more than the expected amount of solvent in the two collection pails. The solvent is pumped from a tube in a left hand pail (facing the machine) through the machine into the right hand pail. The left hand pail starts with clean solvent which will be pumped out as the machine is used to clean the spray guns. If a service representative discovers more than the expected amount of solvent in the two pails, or there is an overfill from the right hand pail, the waste will be sampled for contamination in accordance with the procedures described above, or the waste will be rejected.

2. Paint Waste:

a. Liquid

The significant criterion for the inspection of paint waste is consistency. The waste should contain no more than 30 percent solids. The service representative will insert a Colliwasa or similar sampling device into the drum. The sampling device should glide easily down to the bottom of the drum. The service representative will handle this waste as a Class 3 flammable waste. If there is resistance to the insertion of the glass tube, it is assumed that the level of solids is in excess of 30 percent and the service representative will reject the waste.

The contents of the glass tube are also visually examined for consistency and water content. The material should be a "free flowing" liquid, but should not contain a significant amount of water. If there is more than approximately 10 inches of water in the 3 foot tube (the water and paint will separate in the tube and thus can be measured) the waste will be rejected.

b. Solid

For waste containing more than 30 percent solids the service representative will handle the waste as a Class 4 flammable waste.

3.3.2.b.vi Photographic/Imaging Waste

Photographic/Imaging waste is collected from facilities where one process is managed and the possibility of cross contamination is minimal. The sales representative inspects the contents of the containers of photographic/imaging waste when the sales representative services the customer. The pH and silver content of the waste is checked at the time of service, and the waste is also inspected visually.

3.4 WASTE ANALYSIS

Analyses performed at the Safety-Kleen recycle centers are undertaken to safeguard the recycling process and to assure a product quality. The following section summarizes the waste analyses practiced at the recycle center for the hazardous materials returned from the Albuquerque branch. For each waste type stored at the branch, at least the following analyses must be performed annually (annual re-characterization analysis). If a particular waste stream is not managed at the service center during the previous year, no re-characterization analysis is performed. Copies of the results for the annual analyses must be maintained at the branch office for the life of the permit. A copy of the most recent re-characterization analysis is contained in Attachment 3-1.

3.4.1 Solvents

1. Flash point (must be greater than 90°F);

If the flashpoint is unacceptable, the Albuquerque Branch Manager will be notified immediately and the load will receive appropriate special handling. If the results are acceptable, the following tests will be performed:

2. Volatile Organic Analysis, using EPA Methods 8015, 8021, 8260, or approved equivalents;
3. Physical appearance, including bottom sediment and water content;
4. Specific gravity;

5. pH;
6. Distillation performance

If any of these tests yield unacceptable results or indicate solvent contamination outside the normal range, the Branch Manager will be notified immediately.

In addition to the tests listed above, which will be performed on a representative sample from every load received at the recycle center from the Albuquerque service center, a full Toxicology Characteristic Leaching Procedure (TCLP) analysis for all 40 constituents, (except for pesticides and herbicides) will be performed at least once each calendar year.

3.4.2 Solvent Tank Bottom Sludge and Free Water

1. Flash point (Must be greater than 90°F);
2. Analysis for content of lead, cadmium, and chromium;
3. pH

As described above for solvent, a full TCLP analysis (except for the pesticides and herbicides) will be performed on a representative sample at least once each calendar year.

3.4.3 Immersion Cleaner Solvent

Containers of waste immersion cleaner are typically characterized at the recycle center using the following criteria:

1. Flash point;
2. Physical appearance;
3. Specific gravity;
4. Percent water;
5. Volatile Organic Analysis (using EPA methods 8015, 8021, 8260 or approved equivalents)

If any of these tests yield unacceptable results or indicate solvent contamination outside the normal range, the Branch Manager will be notified immediately. As described above, a full TCLP test (except for pesticides and herbicides) will be performed on a representative sample of immersion cleaner at least once each calendar year.

3.4.4 Dry Cleaning Solvent/Still Bottoms

1. Physical appearance;
2. Volatile Organic Analysis for Perchloroethylene (using EPA methods 8015, 8021, 8260 or approved equivalents);
3. Specific gravity

If any of these tests yield unacceptable results or indicate contamination outside the normal range, the Branch Manager will be notified immediately.

As described above, a full TCLP test (except for pesticides and herbicides) will be performed on a representative sample of dry cleaning waste at least once each calendar year.

3.4.5 Paint Waste

Paint wastes are generally characterized at the recycle center using the following criteria:

1. Metals;
2. Flash points;
3. Physical appearance;
4. Specific gravity;
5. Percent water;
6. Volatile organic analysis (using EPA methods 8015, 8021, 8260, or approved equivalents).

As described above, a full TCLP test (except for pesticides and herbicides) will be performed on a representative sample of paint waste at least once each calendar year.

3.5 WASTE ANALYSIS PLAN UPDATE

This waste analysis plan will be modified when a new waste product is collected or when sampling and material management methods change. Revision of the plan is typically the responsibility of the Safety-Kleen corporate or regional compliance offices. Any revision to this plan will be in accordance with 20.4.1.900 NMAC (incorporating 40 CFR 270.42)

Tables 3-2 through 3-5 summarize the waste analysis plan practiced at the recycle centers for the hazardous waste materials returned from the Albuquerque Service Center.

Table 3-2**Parameters And Rationale For Hazardous Waste Analysis**

| Hazardous Waste | Parameter* | Rationale |
|---------------------------|-------------------------------------|--|
| 1. Spent Solvents | Flash Point | Ignitable Characteristic (D001) |
| | TCLP (preparation method) | Contains components which exceed the limits listed in 40 CFR 261.24 |
| | Hazardous Constituent Concentration | Determination of Waste's LDR Status as required in 20.4.1.800 NMAC (incorporating 40 CFR 268.40) |
| 2. Solvent Tank Bottoms | Same as number 1 | Same as number 1 |
| | Hazardous Constituent Concentration | Determination of Waste's LDR Status as required in 20.4.1.800 NMAC (incorporating 40 CFR 268.40) |
| 3. Used Immersion Cleaner | TCLP (preparation method) | Contains components which exceed the limits listed in 40 CFR 261.24 |
| | Hazardous Constituent Concentration | Determination of Waste's LDR Status as required in 20.4.1.800 NMAC (incorporating 40 CFR 268.40) |

* Earlier sample analyses indicated the parameters listed are the only ones of concern.

| | | |
|------------------------|--|--|
| 4. Dry Cleaning Wastes | <p>Perchloroethylene, 1,1,2-trichloro- 1,1,2,2- trifluoroethane</p> <p>TCLP</p> <p>Flash Point</p> | <p>Contains this ingredient (F002)</p> <p>Contains components which exceed the limits listed in 40 CFR 261.24</p> <p>Ignitable Characteristic (D001)</p> |
| | Hazardous Constituent Concentration | Determination of Waste's LDR Status |

Table 3-3**Parameters And Test Methods**

| Parameter | Test Method | Reference |
|---|---|--|
| Flash Point | Setaflash closed cup tester | U.S. EPA SW 846, Third Ed., Method 1020 (ASTM Method D327-78) or an equivalent method. |
| Hydrocarbons, Volatile and Semivolatile Organic Compounds LDR Constituents | Gas Chromatography (GC) and/or Mass Spectroscopy | U.S. EPA Methods 8010, 8015, 8020, 8120, 8240, and/or 8270 or equivalent methods. |
| Toxicity Characteristics | TCLP (preparation method), followed by 1310 or (3010, 7760) then 6010 and 1310 then 7470. | 40 CFR 261, Appendix II; 55 FR 11798 (March 29, 1990) |

Table 3-4**Methods To Sample Hazardous Wastes**

| Hazardous Waste | Reference for Sampling | Description of Sampling Method | Sampler |
|----------------------------|--|---|--|
| 1. Spent Solvents | Sampling a tank "Samples & Sampling Procedures for Hazardous Waste Streams" EPA - 600/2-80-018 and Safety-Kleen training, ET-143, "Sampling Hazardous Materials and Wastes". | Test Methods for the Evaluation of Solid Waste Physical/Chemical Methods, SW846, U.S. EPA Chapter One, et. seq. And Safety-Kleen Training ET-143, "Sampling Hazardous Materials and Wastes" | Coliwasa Tube, Weighted Bottle Sampler, Pond Sampler, Trier, Large Trier, Auger, Grain Thief, or Scoop as appropriate. |
| 2. Solvent Tank Bottoms | Same as number 1 | Same as number 1 | Same as number 1 |
| 3. Spent Immersion Cleaner | Same as number 1 | Same as number 1 | Same as number 1 |
| 4. Dry Cleaning Wastes | Same as number 1 | Same as number 1 | Same as number 1 |

Table 3-5**Frequency of Analysis**

| Hazardous Waste | Analysis* | Frequency |
|---------------------------|--------------------|-------------------|
| 1. Spent Solvents | Flash Point | At least annually |
| | TCLP | At least annually |
| 2. Solvent Tank Bottoms | Flash Point | At least annually |
| | TCLP | At least annually |
| 3. Used Immersion Cleaner | TCLP | At least annually |
| 4. Dry Cleaning Wastes | Perchloroethylene, | At least annually |
| | 1,1,2-trichloro- | |
| | 1,,2,2- | |
| | trifluoroethane | At least annually |
| | TCLP | |
| | Flash Point | At least annually |

Notes: TCLP = Toxicity Characteristic Leaching Procedure.

* Past analyses have indicated the parameters listed are the only ones of concern.

3.6 LAND BAN NOTIFICATION/CERTIFICATION FORMS

The Permittee shall follow all requirements of Section 2.4 of this Permit.

In accordance with 20.4.1.800 NMAC (incorporating 40 CFR 268.7(a)(2)), Safety-Kleen provides a one time written notice for wastes banned for land disposal with the initial shipment. No further notification is necessary unless the waste changes. Safety-Kleen shall provide the written notice for wastes banned from landfills, in accordance with 20.4.1.800 NMAC (incorporating 40 CFR 268), as follows as follows:

1. Printing the Notice language on manifests - such as for core-business customers to branch shipments; or
2. Special forms for each regularly handled waste types (e.g., parts washer solvents, immersion cleaner, dry cleaning wastes, etc); or
3. A general form that must be completed for unique or non-standard waste streams. These wastes will only be handled on a transfer basis in accordance with 20.4.1.400 NMAC (incorporating 40 CFR 263.12).

The notice is required paperwork for all Safety-Kleen waste types. Further, all wastes stored at the facility will have been characterized and appropriate notification made of LDR requirements, regardless of where the waste was generated and a copy of the required notice maintained in the facility record. Shipments lacking the proper Notice will not be accepted by any Safety-Kleen facility. When a shipment with the proper Notice is received, the notice is kept in the files of the receiving facility with the manifest or with the pre-print if a manifest is not used.

3.7 OPERATING LOG RECORD

Safety-Kleen shall maintain a written operating record on-site of all manifested wastes that enter the Facility as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.73 (a)). The requirements of this Operating Log are detailed in Attachment 8, *Manifesting, Reporting, and Record*.

3.8 WASTE DETERMINATION FOR SUBPART BB AND CC COMPLIANCE

For purposes of waste determination, this Facility utilizes knowledge of the wastes described in Section 3.2, 3.3, and 3.4. For those hazardous wastes, which are managed on a transfer

basis, the Subpart CC regulation does not apply. However, the Permittee may use knowledge of the waste based on information included in manifests, shipping papers, or waste certification notices to confirm waste determination for the generator or the ultimate receiving facility.

Based upon this knowledge, it has been determined that all wastes managed in tanks or containers at this facility may display an average volatile organic concentration of greater than 500 ppmw at the point of waste origination. Documentation of this knowledge is provided in Attachment 3-1 (waste characterization analytical results), as required in 20.4.1.500 NMAC (incorporating 40 CFR 264.1063(d) and 264.1083). Therefore, hazardous wastes managed in tanks or containers at this facility shall be managed in accordance with the applicable Subpart BB and Subpart CC standards.

3.9 WASTE MINIMIZATION PLAN

A copy of the Facility's waste minimization plan is located in Permit Attachment 3-4.

ATTACHMENT 3-1

ANNUAL WASTE RECHARACTERIZATION

ATTACHMENT 3-2

SAFETY-KLEEN MSDS AND LDR FORM

ATTACHMENT 3-3

HAZARDOUS MATERIAL AND WASTE SAMPLING

ATTACHMENT 3-5

WASTE MINIMIZATION PLAN

ATTACHMENT 4 SECURITY PLAN

4.1 INTRODUCTION

The following information has been provided to the New Mexico Environment Department by Safety-Kleen Systems Inc., (Facility), in accordance with the requirements of the New Mexico Hazardous Waste Management Regulations, 20.4.1.900 NMAC (incorporating 40 CFR 270.14(b)(4)).

The Permittee shall ensure security throughout the Facility pursuant to 20.4.1.500 NMAC (incorporating 40 CFR 264.14) and Permit Condition 2.7.

The facility is secured with a six-foot high chain link fence topped by three strands of barbed wire inside a coil of barbed wire. Access gates are locked when the facility is unoccupied. Warning signs in English and Spanish are placed at the entrances stating "Danger - Unauthorized Personnel Keep Out", and are visible from twenty-five feet. An electronic entrance gate is located at the front of the facility, which can automatically be opened and closed to allow trucks to enter and exit. In addition, outdoor lights are on sensing devices that activate at low light conditions.

The office/warehouse building is secured with locks on all doors and warning signs are posted at all entrances to work and waste storage areas. These warning signs are posted in both English and Spanish.

All visitors shall be required to sign a visitors log prior to movement in or around the Facility. Each visitor will be issued a visitor's badge that must be worn while the visitor is on site. The employee guide is responsible for ensuring that all visitors comply with these requirements.

4.2 FACILITY SECURITY

The underground storage tanks are inaccessible in that material cannot be added to or removed from the tanks without activating the pumps. The pumps are not activated unless solvent product or waste is being added to or removed by Safety-Kleen personnel. The controls for the pumps are outside of the return and fill station.

The three container storage units shall be locked during non-operating hours.

As a result the tanks and container storage areas are accessible only by Safety-Kleen personnel. In addition, warning signs are posted on the return and fill station. These warning signs are posted in both English and Spanish.

ATTACHMENT 5

INSPECTION PLAN AND SCHEDULE

5.1 INTRODUCTION

The RCRA inspection program is designed to assure protection of human health and the environment. This is accomplished by the routine examination of permitted units, equipment, and containment structures which, in the event of malfunction or deterioration which is not corrected within a timely manner, could jeopardize the health of persons or affect the environment at the Facility. Inspections are based upon a schedule, which identifies potential or actual non-compliance status of a unit, equipment, or containment structure in a manner that allows the owner/operator adequate time to repair or correct the deficiency found by the inspection.

This Attachment provides information on Safety-Kleen Systems Inc., (Safety-Kleen) Albuquerque, New Mexico Service Center (Facility), as required by the New Mexico Hazardous Waste Management Regulations, 20.4.1.900 NMAC (incorporating 40 CFR 270.14(b)(5)) requiring 20.4.1.500 NMAC (incorporating 40 CFR 264.15), and Permit Condition 2.8.

Safety-Kleen personnel shall conduct regular inspections of all equipment and structures to prevent, detect, or respond to environmental or human health hazards. Inspection records shall be kept at the Safety-Kleen Systems Inc., Albuquerque, New Mexico Service Center administration building for 3 years from the date of the inspection as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.15(d)). The inspections shall cover malfunctions, deteriorations, operator errors, and discharges that may cause or lead to a release of hazardous waste constituents to the environment or may pose a threat to human health.

Facility personnel shall receive general training concerning hazardous waste inspections as part of Safety-Kleen's hazardous waste training program. Personnel responsible for inspecting particular equipment or areas of the facility shall receive on-the-job training in inspection procedures. Inspection procedures shall be kept in an operations manual and records of inspections shall be kept in the operating record pursuant to 20.4.1.500 NMAC (incorporating 40 CFR 264.73(b)(5)), which shall be located on-site in the office of the Branch Manager.

The Service Center Manager (i.e., Branch Manager) or designate is responsible for carrying out and documenting the facility inspection. Example inspection forms are in Attachment 5-1. The inspections are performed each operating day. The Branch Manager shall note any repairs that are needed and assure that they are

completed. If the repairs cannot be implemented by onsite personnel, the Technical Services Department at Safety-Kleen's corporate headquarters must be notified for assistance. Completion of repairs must also be documented on the inspection form and noted in the Facility Operating Record.

The Environmental Compliance Manager or other regional or corporate personnel responsible for compliance issues reviews the Facility Inspection Record with the Branch Manager periodically to insure that they are properly completed and that any necessary repairs have been conducted.

5.2 INSPECTION SCHEDULE AND CHECKLIST

Permit Attachment 5-1 contains applicable inspection forms that shall be used at the Facility. These inspection sheets include records for the daily and weekly 12,000-gallon spent solvent underground storage tank inspection, daily Container Storage Unit (CSU) inspections for the East CSU, West CSU, and the Flammable Storage Building, Facility inspection sheets, and the leak detection and repair record, ensuring that inspections occur at appropriate frequencies. The items to be inspected shall be placed on the schedule that is appropriate for the frequency of inspection to be performed. There is a section on each form for recording the name of the inspector, the date of the inspection, the nature of repairs performed and/or remedial action taken, with comments. The schedules shall be maintained and kept at the Facility.

5.2.1 Tank Inspections

The tanks holding the solvent product and used solvent shall be inspected each operating day. The inspections shall include checks of the high level alarm, the volume held in the tank and checks of the leak detection system for any releases. Sudden deviations in the solvent volumes will be investigated and their causes determined. If necessary, repairs must be initiated immediately. When the tank used to store used solvent is 85% full, a pickup must be scheduled with Safety-Kleen's corporate dispatch department. The solvent must not exceed 95% of the tank volume at any time. The tanks are also inspected to comply with Subpart CC requirements. Vapor pressure summary and Subpart CC compliance information is located in Attachment 5-2.

A liquid sensing leak detector is between the two walls (secondary containment) of the tanks and the recorder chart must be checked each operating day as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.195(b)(2)). Any leaks detected which may indicate damage to the secondary containment must be noted and repairs initiated.

5.2.2 Solvent Dispensing Equipment

The solvent dispensing hose, connections and valves must be inspected for damage (such as cracks or leaks) and proper functioning each operating day. Any solvent in the hoses must be drained after use. The pumps, pipes and fittings must also be checked before use for damage and proper functioning. Any damage to the solvent dispensing equipment must be noted and repaired. The dispensing equipment is also inspected to comply with 40 CFR 264 Subpart BB requirements. An equipment inventory for Subpart BB compliance is located in Attachment 5-3.

5.2.3 Container Storage Units

The East Container Storage Unit, West, Container Storage Unit, and Flammable Storage Building (CSUs) shall be inspected on a daily basis and the number and material condition of the containers shall be notated. The total volume of waste in the CSUs shall not exceed ten times the amount that can be collected in the CSU secondary containment system. The contents of any leaking or suspect containers shall be placed in a container of adequate integrity. All containers shall be properly labeled and marked in accordance with U.S. DOT and the New Mexico Hazardous Waste Regulations. The secondary containment systems of the CSUs shall be inspected for deterioration or failure. If cracks or leaks are detected during the inspection they shall be repaired immediately. Containers in the CSUs shall also be inspected for 40 CFR 264 Subpart CC compliance.

5.2.4 Route Vehicles

Each route vehicle must be inspected daily prior to use to insure proper operation. In addition, necessary safety equipment must be on board and may include sorbents, fire extinguisher, eye wash, first aid kit, reflector kits, rubber gloves, plastic aprons, and safety glasses. Any missing safety equipment shall be replaced immediately.

5.2.5 Drum Washer/Dumpsters

The two wet dumpsters/drum washers (in the return and fill station) shall be inspected weekly for leaks and sediment buildup. Any leaks must be noted and repaired immediately and excess sediment must be removed from the dumpster.

5.2.6 Safety Equipment

The fire extinguishers must be checked weekly to insure that the units are charged and accessible. In addition, the operation of the eyewash must be confirmed weekly and the first aid kit and

sorbents must be inspected weekly for adequate content and accessibility. Emergency equipment information is in Attachment 6, *Preparedness and Prevention*.

5.2.7 Security

The operation of each outside light, gate, and lock must be checked each operating day. In addition, the fence must be inspected for deterioration on a weekly basis.

ATTACHMENT 5-1
INSPECTION FORMS

ATTACHMENT 5-2
VAPOR PRESSURE SUMMARY AND SUBPART CC COMPLIANCE

ATTACHMENT 5-3
EQUIPMENT INVENTORY FOR INSPECTIONS

ATTACHMENT 6

PREPAREDNESS AND PREVENTION

6.1 INTRODUCTION

This section provides preparedness and prevention information on Safety-Kleen Systems Inc., (Safety-Kleen) Albuquerque, New Mexico Service Center (Facility), as required by the New Mexico Hazardous Waste Management Regulations, 20.4.1.900 NMAC (incorporating 40 CFR 270.14(b)(6)) requiring 20.4.1.500 NMAC (incorporating 40 CFR 264 Subpart C), and Permit Condition 2.12.

The Albuquerque service center was designed to minimize the possibility of spills or fires and to minimize the effects of any accidents, which may occur.

Safety-Kleen employees shall perform their duties in the safest, most efficient manner possible. The Albuquerque Service Center is designed to facilitate the handling and storage of the wastes resulting from the services offered by Safety-Kleen. The underground storage tanks, drum storage areas and return and fill station all have secondary containment and the service center has the equipment necessary for employees to safely manage wastes onsite.

6.2 PREVENTATIVE MEASURES

The Safety-Kleen Systems Inc., Albuquerque, New Mexico Service Center (Safety-Kleen) shall be operated using a variety of procedures and equipment that minimize the potential for various hazards. The number one priority at Safety-Kleen is the protection of the employees and the environment.

6.2.1 Prevention of Hazards During Unloading

Unloading hazards shall be reduced through procedures, structural features and equipment used at the CSUs.

Containers of product or waste shall be moved using a handcart or placed on pallets, and moved with a forklift or pallet jack. Upon arrival at the Facility, containers of spent solvent shall immediately be added to the storage tank or placed in the CSU. Open containers of solvent shall not be left unattended.

Safety-Kleen shall maintain hand trucks and safety-rated forklifts specifically designed for hazardous waste container carrying. Containers shall not be lifted more than a few inches above the bed of a trailer before the forklift can back away and lower the containers to a few inches above the floor of the loading dock.

6.2.2 Prevention of Flooding and Run-Off from Waste Handling Areas

The CSUs are roofed and bermed to prevent run-on. Containment in these areas is sufficient to contain spills. Some containers are unloaded outside storage and return and fill areas. Containers of hazardous waste meet DOT requirements, reducing the chance of a release outside of containment.

6.2.3 Prevention of Water Supply Contamination

All the measures discussed in the section above should help to decrease the chance of contamination of water supply. All waste handling shall be performed over concrete and any spills or leaks that do occur shall be cleaned up immediately.

6.2.4 Mitigation of Effects of Equipment Failures and/or Power Outage

Power outages and equipment failures do not create problems in the CSUs for the following reasons:

1. Shouting would be the most effective means of warning employees to evacuate since the intercom will not work during a power outage.
2. Emergency exit signs shall be self-illuminating and visible without electric power.

6.2.5 Prevention of Undue Exposure of Personnel to Hazardous Waste

Training is the key to the prevention of employee exposure. All personnel at the Facility shall be trained in procedures for properly performing CSU and tank transferring operations including handling hazardous wastes and responding to emergency situations. Included in the training shall be instruction in the use and care of personal protective equipment and the location and use of safety showers and eyewash units which are located at strategic points throughout the Facility.

All employees shall be provided with protective equipment, which includes, but is not limited to, hard hats, eye protection, steeled-toed boots, respirators, protective overalls and chemically resistant aprons. Employees and visitors shall be required to wear eye protection in the warehouse, on the docks and in the yard at all times. Hard hats shall be worn in the warehouse when transferring containerized wastes.

When transferring wastes or cleaning up hazardous waste spills is required, the worker(s) shall wear the appropriate personal protective equipment.

6.2.6 Prevention of Releases to the Atmosphere

In addition to the precautions taken at the CSUs to prevent releases, Safety-Kleen shall implement preventive procedures before the waste is transported to the CSUs. Before loading the containers of waste at a generator's facility, the containers shall be checked for soundness, proper closure, proper labeling, and compliance with U.S. Department of Transportation (DOT) standards. Any damaged containers that might leak or burst during transporting or unloading shall not be accepted for transportation.

6.3 PRECAUTIONS FOR PREVENTION OF ACCIDENTAL IGNITION OR REACTION OF IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

All ignitable or flammable containerized materials are stored in the Flammable Storage Building located in the east area of the Facility. The Facility has a combination of building design and procedural measures to prevent accidental ignition or reaction of ignitable, reactive or incompatible wastes. The first precaution taken shall be to ensure that the hazardous waste received is what is described on the generator's profile and the manifest accompanying the waste so that it can be stored properly. The procedures to accomplish this are described in the *Waste Analysis Plan*, Permit Attachment 3.

Containerized waste materials shall be stored only in closed DOT approved containers. These containers shall not be opened unless sampling or repackaging is necessary. Opening of containers shall be strictly prohibited in the storage areas.

The storage areas for the containers are inside the East and West Container Storage Areas, and the Flammable Storage building, thus allowing protection of the waste from extreme heat, cold, and sunlight.

In order to decrease hazards caused by storing incompatible wastes, any incompatible wastes shall be segregated within the CSUs. The CSUs have secondary containment areas designed to contain any material within that area should a spill or leak occur. Routine inspections of containers and container storage areas shall be conducted to allow site personnel to detect a spill or leak quickly and to identify potential problems before they occur.

All storage containers holding hazardous waste that is incompatible with other wastes and materials shall be separated and protected from these wastes and materials by barriers placed within the CSUs.

Sources of ignition shall be eliminated by several means. First, containers of flammable and combustible materials shall be stored in the Flammable Storage Building away from electrical equipment. The Flammable Storage Building is constructed with special explosion proof wiring and is equipped with a fire suppression system, away from electrical equipment; and second, electrical outlets shall not be located in the areas where these wastes are stored.

Smoking, and use of matches or lighters shall only be permitted in designated areas, which are separate from any waste management areas. "NO SMOKING" signs shall be posted at all entrances to the CSUs and in the vicinity of the return and fill station, handling areas, and other prominent places throughout the Facility. Welding, cutting and other high temperature operations shall not be allowed near the vicinity of the waste storage and handling areas unless proper precautions and planning are done and the work is approved by Safety-Kleen.

6.3.1 Required Aisle Space

The Facility operators shall maintain sufficient aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the Facility operation in an emergency.

The CSUs shall meet these requirements. The arrangement of containers in the staging area shall always be configured to meet aisle space requirements and to ensure that the forklifts, personnel, fire protection equipment, spill control equipment, and decontamination equipment can safely access the hazardous waste containers.

6.4 TRAFFIC PATTERNS

The majority of the vehicular traffic, and loading/unloading operations occur at and near the return and fill station. This area is paved with asphalt and concrete. The traffic plan is located in Attachment 6-1.

The entrance to the Facility is on Girard Boulevard, which is the major access route to the Facility. The access road was designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the manufacturing activities in this area. The route van that travels the routes

daily between the Service Center and Safety-Kleen's customers, uses the two lane approach driveway.

6.5 WASTE MANAGEMENT PRACTICES

The Albuquerque service center was designed to facilitate the handling and storage of the wastes resulting from the services offered by Safety-Kleen. The underground storage tanks, drum storage areas and return and fill station all have secondary containment and the service center has the equipment necessary for employees to safely manage wastes onsite. Attachments 6-2 and 6-3 contain drawings of the waste management facility.

Used solvent from parts washers is accumulated in a 12,000 gallon underground double-walled storage tank via the return and fill station. Used material in containers meeting DOT specifications is poured into the dumpsters in the return and fill station and the material in the dumpster is pumped into the used solvent storage tank. The return and fill station has secondary containment in the form of a 20.0' x 14.8' (1,548 gallons) concrete slab with curbing and a sump. The total volume of waste and product will not exceed 10 times the secondary containment volume

The sediment which accumulates in the bottom of the dumpster/drum washer is removed manually (as necessary), drummed and temporarily stored in the return and fill station according to the satellite accumulation requirements of 20.4.1.300 NMAC (incorporating 40 CFR 262.34(b)). Sediment is placed in the drum to no more than 2 inches from the top of the drum.

The underground tanks have been designed in accordance with UL Standard 58 and are constructed of carbon steel and are installed in accordance with NFPA standards. Double walls equipped with a leak detection alarm provide secondary containment. Two tanks with capacities of 12,000 gallons each are present; one is for clean and one is for used solvent. Each tank is equipped with an audible and visual high level alarm to alert employees when the tank is approximately 600-gallons (95%) from being full.

The container storage areas in the warehouse are used to store containers of waste, which may include (1) used immersion cleaner, (2) dry cleaning wastes, and (3) used aqueous solvent and (4) used photochemical wastes. Additional materials, such as non-hazardous wastes, transfer wastes, or product may be stored as needed. The wastes are not mixed while on site and different wastes are segregated according to their contents. While the wastes are not incompatible with one another, it is necessary to segregate them for inventory and quality control purposes. All containers are stored on pallets.

Non-hazardous material, wastes that are not regulated (including transfer wastes), and Safety-Kleen products may also be stored in the CSUs. The wastes stored in the CSU are not handled on site, and are segregated in properly labeled containers to indicate their contents. Incompatible wastes or materials shall not be stored in the CSUs. Ignitable/flammable wastes are stored in the Flammable Storage Building, which is located at least 50-feet from the Safety-Kleen property boundary.

The CSUs have secondary containment. The West Storage Unit has secondary containment in the form of 6-inch wide by 4-inch high steel reinforced concrete curbs with a 1.75' x 3' x 11' (431 gallon) collection trench. The East Storage Unit has secondary containment in the form of 6-inch wide by 4-inch high steel reinforced concrete curbs with a 2' x 3' x 3' and a 2' x 1.5' x 6' (268 gallon) collection trench. The Flammable Storage Building secondary containment is provided by coated floors that slope to three collection trenches. The three trenches have dimensions of approximately 1.8' x 8.9' x 2.3' (276 gallons), 1.9' x 9.8' x 2.1' (295 gallons), and 1.9' x 11.9' x 2.3' (390 gallons) for a combined collection capacity of 965 gallons. Safety-Kleen shall not store more than 16,640 gallons of waste in the CSUs at any one time.

Containers used for the storage of hazardous waste shall meet DOT requirements and shall have a maximum capacity of 55-gallons (except for 85-gallon over-pack drums). Example specifications for containers used at the Service Center are shown in Permit Section 3.3. 55-gallon containers in the CSU shall be placed on pallets and stored no more than two high. 9-gallon containers shall be stacked no more than 10 high. The 9-gallon containers (black, blue, or otherwise) are described as 3H1/Y1.2/60/97 USA/+AA1170 4.1. (+AA1170). Containers used may be manufactured in years other than 1997. The containers are approximately 26.5-inches x 13.5-inches x 6-inches (l x w x h). The containers have a liquid capacity of approximately 9-gallons each and are typically used to hold 5-gallons of material. Both petroleum based and water based solvents may be held in the containers.

An example of the configuration for the storage of containers is shown in Permit Attachment 1-3.

6.6 POTENTIAL MINOR SPILL SOURCES

The following is a list of activities that have the potential for a minor (one that can be remediated without assistance from a clean up contractor) pollution incident:

6.6.1 Pouring of Drummed Solvent into the Drum Washer/Dumpster

Employee training emphasizes the importance of taking care in emptying the drums. As the contents of the containers are poured into the drum washer/dumpster, waste can be splashed out. The return and fill station is underlain by a concrete slab and curbing. This is designed to contain this type of spill.

6.6.2 Filling of Containers with Solvent Product

A low-pressure hose with an automatic shutoff valve, similar to those used at automotive service stations, is used to fill the containers with parts washer solvent. Leaking fittings, a damaged hose, or carelessness could lead to spilling the solvent. Manual emergency shut-off valves are located on each hose, should the equipment not function properly. In addition employee training emphasizes the importance of inspection, maintenance, and reporting of conditions with pollutant incident potential.

6.6.3 Moving of Containers

When a container is moved, the potential exists for the container to tip over. To minimize the potential for spillage of waste, containers shall be maintained in an upright position and remain tightly covered while in storage or in transit. The drum storage areas are designed so that if the contents of a container are spilled, the spilled material will be contained within the trenches. If material is spilled other containers are situated on pallets, therefore they will not be in contact with the spilled material.

6.6.4 Delivery Truck Transfers

The cargo should be secured in the route vehicle with straps before transport. Individual containers of solvent can tip over or be dropped when being moved on or off a delivery truck so transfers will be made using a handcart and a hoist, if necessary.

If a spill does occur, the amount of solvent in the containers is normally a quantity, which can be collected with sorbent clay or pads. Any contaminated soil that results from a spill will be removed manually, drummed, and shipped to a Safety-Kleen recycle center for proper disposal.

6.7 POTENTIAL MAJOR SPILL SOURCE

The following activities have the potential for a major (one for which remedial action will require assistance) pollution incident:

6.7.1 Overfilling of Storage Tanks

Both product and spent solvent tanks can be overfilled with a resulting discharge of material. A high level alarm and daily checks of tank volumes will prevent this type of incident.

6.7.2 Leaking Pipelines

The pipelines and other equipment present a potential for leaks and resultant pollution. Regular inspection of this equipment and the solvent inventory will detect any leaks.

6.8 POTENTIAL FIRE SOURCES

"No Smoking" signs are posted in areas where solvents are handled or stored.

Fire extinguishers must be checked once per week and tested by the fire extinguisher company once per year. Fire extinguishers are placed at several locations throughout the facility.

The following is a list of fire prevention and minimizing measures:

6.8.1 All Wastes and Products kept away from Ignitable Sources

Smoking is only permitted in designated areas, which are separate from any waste management areas. The solvent handling areas and the underground storage tanks are separated from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.

6.8.2 Handling Ignitable Wastes

Ignitable wastes are handled so that they do not:

1. Become subject to extreme heat or pressure, fire or explosion, or a violent reaction. The solvent waste or other wastes are stored in a tank or in containers, none of which are near sources of extreme heat, fire, potential explosion sources, or subject to violent reactions. The tanks are vented and the containers are

stored at room temperature to minimize the potential for pressure build up.

2. The vapor pressure of Safety-Kleen solvents is low (2mm) and it is reactive with strong oxidizers only. Toxic mists, fumes, dusts, or gases will not form in quantities sufficient to threaten human health since strong oxidizers are not handled at the Service Center, and the solvent vaporization will be minimal under normal working conditions.
3. Produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion.
4. The parts washer solvents or other containerized wastes will not cause deterioration of the tank, containers, or other structural components of the facility.

6.8.3 Adequate Aisle Space

Aisle space shall be maintained to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.

6.9 TANK EVALUATION AND REPAIR PLAN

The product and waste solvent stored in the tanks at this facility are compatible with the carbon steel structure. If, during the inspections, corrosion is noted, or the leak detection system indicates a leak, the tank will be immediately taken out of service and repaired and/or replaced. In the case of a tank which leaks outside of the secondary containment, the facility's contingency plan will be initiated to insure the removal of any contaminated soil. Any extensive repairs to or replacement of the tank system will be assessed and certified by an independent professional engineer before the system is returned to use as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.196(f)).

Each valve, flange, and pump associated with the 12,000-gallon underground storage tanks and their ancillary equipment shall be marked and listed on the respective air monitoring inventory form. A site drawing located in Attachment 5-3 shows the locations and numbers of the equipment. Compliance with 20.4.1.500 NMAC (incorporating 40 CFR 264 Subpart BB) shall be achieved through facility inspections each operating day, and if required, leak detection monitoring and repair shall be conducted. Records of equipment monitoring and repair are maintained on the inspection form, located in the Facility Operating Record. If a potential leak is discovered, by any

means, it shall be noted on the inspection form, repaired immediately, or as soon as possible, and not used again until all requirements of 20.4.1.500 NMAC (incorporating 40 CFR 264.196) are satisfied. The leak detection and repair record shall be kept in a file at the Facility.

Tank construction diagrams and the certification report are located in Attachment 6-3.

6.10 EXTERNAL FACTORS

The design of the facility is such that a harmful spill is highly unlikely to occur from most external factors. The storage tanks are accessible only to Safety-Kleen personnel and the main power switches are located inside. Also, the CSUs are in buildings which are accessible only to authorized personnel.

The external factors are listed as follows:

1. Vandalism - only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the contingency plan;
2. Strikes - A strike would not result in a solvent spill or fire;
3. Power failure - A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease (i.e. pumps will be deactivated);
4. Flooding - The site elevation is above the projected 100-year flood plain, therefore a 100-year flood will not affect the Facility;
5. Storms or Cold Weather - The solvent return and fill station and CSUs are roofed to eliminate the possibility of rain or snow entering the areas. No precipitation event is anticipated that will affect the Facility.

6.11 INTERNAL AND EXTERNAL COMMUNICATIONS AND ALARM SYSTEMS

Because the facility is small, internal communication within the building and the solvent return/fill area is accomplished by voice. An alarm is located at the return and fill station which alerts another employee in the warehouse that there may be a problem. Telephones will be used to report a spill or fire and to summon assistance from local and state emergency response

agencies (if necessary). Emergency phone numbers of local and state emergency response teams are posted by each phone located in the sales office. Included in these phone numbers is the 24-hour telephone number which can be used to contact Safety-Kleen's environmental response coordinators. Releases to the environment will be reported within 24 hours, as required in Part 1 of this Permit, and Permit Attachment 7, *Contingency Plan*.

ATTACHMENT 6-1
TRAFFIC PATTERN

ATTACHMENT 6-2
CONTAINER SPECIFICATIONS AND UNIT LAYOUT

ATTACHMENT 6-3
TANK CONSTRUCTION DIAGRAMS AND CERTIFICATION REPORT

ATTACHMENT 7 CONTINGENCY PLAN

7.1 INTRODUCTION AND PURPOSE

The contingency plan describes the actions to be taken by each employee in the event of a spill, fire, explosion, or other emergency. It includes the information necessary to address emergency situations efficiently and in such a manner as to prevent or minimize hazards to human health or the environment due to fire, explosion, or any other release of hazardous materials to the air, soil, surface, water, or groundwater.

The contingency plan is to be carried out immediately whenever there is a release of hazardous material, which could threaten human health or the environment. The Branch Manager ensures that the contingency plan is updated as necessary.

7.2 DISTRIBUTION AND AMENDMENT OF THE PLAN

The most current version of the contingency plan shall be maintained at the Facility and copies shall be distributed to:

1. Albuquerque Police Department 911 or 505-242-2677
2. Presbyterian Hospital 911 or 505-841-1111
or (non-emergencies) 505-345-3655
3. Albuquerque Fire Department 911 or 505-243-6601
4. Safety-Kleen 24-Hour Emergency 800-468-1760
Response
5. New Mexico Environment Department 505-827-9329
6. Rinchem Inc. 505-883-4242
(24-Hour Central Security).
7. National Response Center 800-424-8802

7.3 ARRANGEMENTS WITH LOCAL AUTHORITIES

Arrangements have been made to familiarize the police department, fire department and local emergency response teams with the layout of the facility, the properties of hazardous materials handled and associated hazards, locations where facility personnel normally work, entrances to and roads inside the

facility and possible evacuation routes. Arrangements have also been made to familiarize the Presbyterian Hospital with the types of injuries or illnesses, which could result from fires, explosions, or releases, and the properties of the hazardous waste handled at the Facility.

If a Safety-Kleen employee needs to be treated, the medical center and the ambulance service, if any is being used, shall be informed ahead of time, as much as possible, of the employee's name, the nature of the injury and any contamination involved.

Copies of the Contingency Plan transmittal letters to local authorities are located in Attachment 7-1.

7.4 EMERGENCY COORDINATOR

The Emergency Coordinator (EC) or alternate Emergency Coordinator is responsible for implementing the Contingency Plan during an emergency; however, all employees must be familiar with the procedures in this plan and are responsible for proper implementation of the plan should the emergency coordinator or alternate be unavailable. The Branch Manager is the emergency coordinator and the alternate emergency coordinator is a trained employee designated to this position by the Branch Manager.

The emergency coordinator and alternate must be familiar with all aspects of this contingency plan, the operations and activities at the Facility, the location and characteristics of materials handled, the location of all records within the facility and the facility layout. In addition, these coordinators have the authority to commit the resources necessary to carry out the contingency plan. Their home addresses and telephone numbers, as well as the office telephone number, are listed in Attachment F-1. Also listed in Attachment F are the assigned duties of each employee during an emergency. At least one employee will be at the facility or on call to respond to an emergency situation. In addition, facility personnel should be aware of the location of emergency equipment. An emergency equipment location plan is included in Attachment 7-2.

7.4.1 Responsibilities During an Emergency

Whenever there is an imminent or actual emergency situation that requires implementation of this Contingency Plan, the Emergency Coordinator (or alternate when the Emergency Coordinator is not available) shall immediately:

1. Activate the internal facility communication system to notify all facility personnel;

2. Notify Safety-Kleen's Emergency Response Coordinator using the 24-hour telephone number, 1-800-468-1760; and
3. Notify appropriate state or local agencies with designated response roles.

Whenever there is a release, fire, or explosion, the emergency coordinator shall immediately try to identify the character, exact source, amount, and extent of any contamination. Because of the limited number of materials handled at the Facility, the emergency coordinator may be able to do this by observation or by review of Facility records. If necessary, outside laboratories may be contacted to perform chemical analyses.

Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment shall consider both direct and indirect effects of the release, fire, explosion (i.e. the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous run-off).

During an emergency, the EC shall take all measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the Facility. These measures must include where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

7.4.2 Remedial Action Responsibilities

If the environment has been contaminated or there is a potential for contamination as a result of a fire, explosion, or spill, the EC shall contact Safety-Kleen's Emergency Response Coordinator to report the incident. Any situation that has the potential for releasing solvent or solvent vapors or causing a fire or explosion shall also be addressed in accordance with the contingency plan. Should there be any questions as to whether this plan should be implemented (i.e., a problem is suspected but cannot be confirmed), Safety-Kleen's regional and/or corporate offices should be consulted for guidance.

The Emergency Coordinator shall ensure that, in the affected area(s) of the Facility that:

1. No substance that may be incompatible with the released materials is brought on site until cleanup procedures are completed; and
2. All emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use before

operations are resumed.

7.4.3 Reporting Responsibilities

If the Emergency Coordinator determines that the Facility has had a release that could threaten human health or the environment, the Emergency Coordinator shall report those findings as follows:

1. If the assessment indicates that evacuation of local areas may be advisable, the emergency coordinator shall immediately notify appropriate authorities;
2. The emergency coordinator shall immediately notify Safety-Kleen Emergency Response Coordinator and the New Mexico Environment Department (NMED) of any spill or release or hazardous waste within 24-hours (except for spills of one pound or less that are immediately cleaned up). The emergency coordinator will report to NMED the following as required in 20.4.1.500 NMAC (incorporating 40 CDR 264.56(d) (2)):
 - a. Name and telephone number of notifier;
 - b. Name and address of the Facility;
 - c. Time and type of incident (i.e. release, fire);
 - d. Name and quantity of material(s) involved, to the extent known;
 - e. The extent of injuries, if any, and
 - f. The possible hazards to human health, or the environment outside the Facility.

Safety-Kleen shall notify the appropriate state and local authorities that the affected facility is in compliance with Section 7.4.2 before operations are resumed in the affected area(s) of the Facility.

The EC shall document the time, date, and details of any incident that requires the implementation of the Contingency Plan in the Facility Operating Record. Within 15 days of the incident, Safety-Kleen shall submit a written report on the incident to the New Mexico Environment Department. This report shall contain the information specified in 20.4.1.500 NMAC (incorporating 40 CFR 264.56(j));

1. Name, address, and telephone number of the owner or

operator;

2. Name, address, and telephone number of the Facility;
3. Date, time, and type of incident (i.e. fire, explosion);
4. Name and quantity of material(s) involved;
5. The extent of injuries, if any;
6. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
7. Estimated quantity and disposition of recovered material that resulted from the incident.

7.4.4 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is as follows:

1. The person who discovers/causes the spill reports to the Emergency Coordinator; and
2. The Emergency Coordinator contacts the Safety-Kleen Emergency Response Coordinator and the New Mexico Environment Department.

7.4.5 Government Agencies and Local Authorities to Be Notified

During an emergency, the following government agencies and local authorities may be contacted. See Section 7.3 for arrangements:

| <u>Agency or Authority</u> | <u>Rationale</u> |
|----------------------------|---|
| Police Department | Notify if there is imminent danger to human health. |
| Fire Department | Notify if there is a fire, explosion, uncontrolled spill, or other imminent danger. |
| Hospital | Notify if there are any injuries. |
| NMED | Report releases, fires, and explosions. |

Rinchem Inc.

Call to assist with remedial
action after a release.

7.5 EMERGENCY RESPONSE PROCEDURES

Response actions to be taken in specific emergency situations are described in the following sections.

7.5.1 Minor Spills

If a spill should occur while pouring spent solvent into a drum washer/dumpster or filling containers with solvent product at the return and fill station, and it is contained in the secondary containment at the base of the return and fill station, remedial action will not be necessary. Should the spill occur outside the containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

1. If the solvent spills on a paved area, it must be collected with sorbent sheets and/or sorbent clay (such as "Oil Dry"). The sorbents will be collected, drummed and shipped to a Safety-Kleen recycle center or other permitted facility for proper treatment and/or disposal.
2. If the solvent spills on an unpaved area, the free solvent must be collected with sorbent material. The sorbent material and any contaminated soil must be collected, drummed and shipped to a Safety-Kleen recycle center or other permitted facility for proper treatment and/or disposal.

If a spill occurs while moving or delivering drums outside of the warehouse, the response actions described in '1' and '2' above shall be followed. Spills inside the warehouse will be prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoors, the doors and windows should be opened to improve the ventilation in the confined area. If solvent is spilled in a non-explosion rated area or is flowing in such, insure that all sources of ignition (e.g., thermostats or light switches) are left in the same position (either on or off) as at the time of the spill. The worker will enter the area wearing appropriate personal protective equipment (PPE). The Material Safety Data Sheets (MSDSs) will be consulted to ensure appropriate PPE and spill procedures are utilized. Example MSDSs for typical Safety-Kleen products are presented in Attachment 3-2. Generally, spilled liquids are collected, placed in a container, and returned to storage.

Cleanups are completed only when the workers have cleaned themselves and the emergency equipment with soap and water. All minor spills must be reported to the Safety-Kleen Emergency Response Coordinator and the coordinator will contact the New Mexico Environment Department (if the spill is of a reportable quantity).

In the event a container is leaking, the contents will be transferred to a new container with a portable pump. A wet/dry vacuum is present at the site and may also be used in the event of a minor spill.

7.5.2 Major Spills

Any spill, which cannot be completely remediated using the methods described in '1' and '2' of section 7.5.1, is a major spill. A major spill is usually the result of a vehicular accident, tank overfilling, equipment failure or a fire. Spilled material, which escapes collection, can contaminate soil, surface water, ground water, sanitary sewer systems and storm sewer systems. Emergency response to this type of spill should be as follows:

1. Assist any injured people;
2. Stop the flow of materials, if possible;
3. Retain, contain or slow the flow of the materials if it can not be stopped;
4. If solvent escapes containment efforts, immediately call the local Fire Department and the NMED, and report to the emergency coordinator and the Safety-Kleen Emergency Response Coordinator;
5. Immediately recover the spilled solvent to reduce property and environmental damage. Start recovery operations immediately.

The emergency coordinator shall report any incident as soon as possible to Safety-Kleen Emergency Response Coordinator using the 24-hour telephone number, (800) 468-1760. The Emergency Coordinator shall call an emergency cleanup response contractor, if it is deemed necessary, and report the incident to the National Response Center (telephone: 800/424-8802) and the New Mexico Environment Department (telephone: (505) 827-9329 - 24 hour number).

The person reporting a spill should be prepared to give their name, position, company name, address and telephone number. The

person reporting should also describe the material spilled and, if possible, some estimate of the amount, and the containment status and specify any equipment needed. Contaminated material resulting from remedial actions for major spills, will usually be disposed of at a properly permitted treatment or disposal facility.

Equipment used to respond to spills must be cleaned and decontaminated with a detergent/water solution. All incidents will be documented and kept on file as part of the operating record. They will be reviewed with branch personnel to prevent similar spills from occurring in the future.

All rinsates, waste residues, and decontamination fluids from the cleanup of spills or releases (whether major or minor) shall be containerized and managed as hazardous waste unless analytical results verify the wastes as not hazardous. Wastes resulting from spill cleanups will be disposed of in accordance with applicable regulations.

Incidents will be documented and kept on file as part of the operating record. The incidents will be reviewed with branch personnel to prevent similar spills from occurring in the future.

7.5.3 Fire Control Procedures

If a small fire occurs, personnel must act quickly with an appropriately rated fire extinguisher to put out the fire before it spreads. If it cannot be extinguished immediately the Facility will be evacuated and the fire and police departments will be contacted.

It is Safety-Kleen's policy that personnel only respond to incipient fires; that is, those that can immediately be extinguished using a fire extinguisher. Any fire which cannot be brought under control immediately or which has the potential to become uncontrollable, warrants implementation of the evacuation plan. Ignitable waste at the Albuquerque facility is stored in specially designed tanks, or in containers and placed in the Flammable Storage Building.

Safety-Kleen personnel and local authorities must be aware of appropriate response procedures, should a fire occur at the facility. This may include isolating the hazardous area and donning an appropriate positive pressure breathing apparatus.

7.6 EVACUATION PLAN

Exits are clearly marked in the warehouses and office areas. Employees are trained to be aware of all potential escape routes.

The Facility evacuation plan is included in Attachment 7-4.

When an uncontrolled fire or release has occurred, all personnel are to be evacuated from the area and assemble across Girard Boulevard to assure that all personnel are accounted for and out of the hazardous area. The fire department must be notified at the time of evacuation either from a safe on-site building or from a neighboring facility or using a cellular phone.

7.7 ARRANGEMENT WITH EMERGENCY RESPONSE CONTRACTORS

An emergency response contractor (Rinchem, Inc.) is identified in Section 7.1. This contractor will provide emergency assistance during a release and/or cleanup.

7.8 POLLUTION INCIDENT HISTORY

There are no records of a pollution incident having occurred at this Facility.

7.9 IMPLEMENTATION SCHEDULE

Where a hazard is imminent or an accident has already occurred, remedial action shall be taken immediately. The Branch Manager has the overall responsibility for remediating any discrepancies found during a routine inspection, and will consult with the corporate environmental and engineering staffs to design an implementation schedule.

7.10 AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN

This plan and all revisions to the plan are kept at the Facility and regularly updated throughout the operating life of the Facility. Copies of this document are provided to local authorities and organizations listed in Section 7.1, and they may be called upon to provide emergency services. In addition, this plan and all revisions to the plan are made readily available to employees working at the Facility.

The plan is reviewed and updated, if necessary, whenever:

1. The Facility Permit is modified to allow new wastes to be stored or treated, or applicable regulations are revised;
2. The list or location of emergency equipment changes;
3. The Facility changes in its design, construction, operation maintenance, or other circumstances in a way

that:

- a. Increases the potential for fires, explosions, or releases of hazardous constituents, or;
 - b. Changes the response necessary in an emergency;
- 4. The names, addresses, or phone numbers of emergency coordinators change;
 - 5. The employee assigned to each emergency task changes;
or
 - 6. The plan fails when implemented in an emergency.

ATTACHMENT 7-1
TRANSMITTAL LETTERS

ATTACHMENT 7-2
EMERGENCY EQUIPMENT AND LOCATIONS

ATTACHMENT 7-3
EMERGENCY CONTACTS

ATTACHMENT 7-4
FACILITY EVACUATION PLAN

ATTACHMENT 8
MANIFESTING, REPORTING, AND RECORD KEEPING

8.1 MANIFESTING

Safety-Kleen shall include a hazardous waste manifest whenever hazardous waste is shipped off-site from the Facility to treatment, storage and/or disposal facilities. All specific manifest requirements shall be completed in accordance with all applicable requirements of 20.4.1.500 NMAC (incorporating 40 CFR 264.70 through 40 CFR 264.77).

8.2 HAZARDOUS WASTE RECEIPT (MANIFESTED WASTE)

Upon Safety-Kleen receipt of hazardous waste accompanied by a manifest, the following steps shall be taken as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.71):

1. Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received;
2. Note any significant discrepancies in the manifest as defined in 20.4.1.500 NMAC (incorporating 40 CFR 264.72(a)) on each copy of the manifest.
3. Immediately give the transporter at least one copy of the signed manifest;
4. Once the waste is received at the Facility, the manifest shall be terminated and the original mailed back to the off-site generator;
5. Within 30 days after receiving off-site waste, Safety-Kleen shall send a copy of the manifest to the generator;

Safety-Kleen shall file the treatment, storage, and disposal facility (TSDF) copy and retain a copy of each manifest at the Facility for at least 3 years from the date of delivery. A specific location shall be assigned for storing the waste based on its characteristics. This storage location shall be entered into the Safety-Kleen accounting computer system and hazardous waste log. Movement of hazardous waste within the Facility does not routinely occur.

8.3 UNMANIFESTED WASTE REPORT

Safety-Kleen shall not accept unmanifested waste from off-site generators. Therefore 20.4.1.500 NMAC (incorporating 40 CFR

264.76) does not apply and additional reporting is not required. However, if for some unforeseen reason waste is accepted without a manifest then Safety-Kleen shall prepare and submit a single copy of a report to the Secretary within 15 calendar days after receiving the waste. The unmanifested report shall be submitted on EPA form 870013B. The report shall be designated "Unmanifested Waste Report" and shall include the following information:

1. The EPA identification number, name and address of the facility;
2. The date the facility received the waste;
3. The EPA identification number, name, and address of the generator and the transporter, if available;
4. A description and the quantity of each unmanifested hazardous waste and facility received;
5. The method of storage for each of the unmanifested waste;
6. The certification signed by the owner of the facility or the authorized representative;
7. A brief explanation of why the waste was unmanifested.

8.4 RECORD KEEPING

The following information shall be recorded as it becomes available and shall be maintained in the operating record until closure of the Facility:

1. Description and quantity of hazardous waste received, and the methods and dates of its storage at the Facility. This information shall also include:
 - a. Common name of the waste;
 - b. Applicable EPA waste codes from 40 CFR Part 261;
 - c. Physical form of the waste;
 - d. Description of the process generating the waste if the waste is not a waste listed in 20.4.1.300 NMAC (incorporating 40 CFR 261 Subpart D);
 - e. Estimated or manifest-reported weight, or volume and density in one of the units specified in

Appendix I of 20.4.1.500 NMAC (incorporating 40 CFR 264);

f. Applicable handling code specified in Table 2, Appendix I of 20.4.1.500 NMAC (incorporating 40 CFR Part 264 (e.g., S01));

g. Dates of storage;

h. Records and results of waste analyses and waste determinations, including:

Waste characterizations, as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.13);

Additional information regarding waste analysis and characterization records as provided in Permit Attachment 3, *Waste Analysis Plan*;

General requirements for ignitable, reactive, or incompatible wastes, as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.17);

Air emission analyses as applicable under 20.4.1.500 NMAC (incorporating 40 CFR 264 Subpart CC).

8.5 MANIFEST DISCREPANCIES

Upon discovering a significant manifest discrepancy, the Branch Manager shall attempt to reconcile the discrepancy with the waste generator or transporter through telephone conversations or otherwise. If the discrepancy is not resolved within 15 days after receiving the waste, the Branch Manager shall immediately submit, to the Secretary and regional administrator, a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue. Significant manifest discrepancies are differences between the quantity or type of hazardous wastes designated on the manifest or shipping paper and the quantity or type of hazardous waste a facility actually receives, as follows:

1. For bulk waste, significant discrepancies are variations of more than 10% in weight;
2. For batch waste, a significant discrepancy is any variation in piece count, such as a discrepancy of one container in a truckload; and
3. Significant discrepancies in type are obvious differences which can be discovered by inspection or

waste analysis, such as waste solvent substituted for waste acid or toxic constituents not reported on the manifest or shipping paper.

8.6 OPERATING RECORD

Safety-Kleen shall maintain an operating record at the Facility. In the operating record the following shall be maintained for the life of the Facility unless otherwise noted as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.73):

1. A description and quantity of each waste received and the method and dates of storage;
2. The location of each hazardous within the Facility and the quantity of waste at the location;
3. The information in the operating record shall cross-reference the specific manifest document numbers;
4. Records and results of waste analysis and waste determinations shall be maintained in the operating record at the;
5. Summary reports and details of incidents that require implementing the contingency plan;
6. Records and results of inspections;
7. Monitoring, testing or analytical data and any corrective action where required by 40 CFR 264 Subpart F and in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.73(b)(6));
8. For off site facilities, notices to generators as specified in 20.4.1.500 NMAC (incorporating 40 CFR 264.12(b));
9. All closure cost estimates;
10. Certification by the Permittee no less often than annually, that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste the Permittee generates to the degree determined by the Permittee to be economically practicable and as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.73(b)(9));
11. Records of the amount of each shipment of hazardous waste placed in land disposal units in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.73(b)(10));

12. For an off-site treatment facility, a copy of the notice, and the certification and demonstration if applicable, required by the generator or owner or operator of a treatment facility under 40 CFR 268.7 and 40 CFR 268.8 in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.73(b) (11));
13. For an off-site land disposal facility a copy of the notice, and the certification and demonstration if applicable, required by the generator or owner or operator of a treatment facility under 40 CFR 268.7 and 40 CFR 268.8, whichever is applicable in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.73(b) (13));
14. For an off-site storage facility, a copy of the notice, and the certification and demonstration if applicable, required by the generator or owner or operator of a treatment facility under 40 CFR 268.7 and 40 CFR 268.8 in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.73(b) (15));
15. For an on-site storage facility the information contained in the notice (except the manifest number), and the certification and demonstration if applicable, required by the generator or owner or operator of a treatment facility under 40 CFR 268.7 and 40 CFR 268.8 in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.73(b) (16));
16. Any records required by 40 CFR 264.1(j) (13)).

8.7 AVAILABILITY, RETENTION, AND DISPOSITION OF RECORDS

All records including plans, required under Section 8.8 shall be furnished upon request, and made available at all reasonable times for inspection by any officer, employee, or representative of NMED who is duly designated by the Secretary.

The retention period for all records required under Section 8.8 is extended automatically during the course of any unresolved enforcement action regarding the Facility or as requested by the Secretary as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.74).

8.8 BIENNIAL REPORT

The Permittee shall prepare and submit a single copy of the biennial report to the Secretary, by March 1 of each even

numbered year. The biennial report shall be submitted on EPA form 8700-13B and shall contain the following information:

1. The EPA identification number, name and address of the Facility;
2. The calendar year covered by the report;
3. For off-site facilities, the EPA identification number of each hazardous waste generator from which the Facility received hazardous waste during the year;
4. Description and the quantity of hazardous waste Safety-Kleen received during the year. For off-site facilities, this information shall be listed by EPA identification number of each generator;
5. The method of storage for each hazardous waste;
6. The most recent closure estimate under 40 CFR 264.142;
7. For generators who store hazardous waste on-site, a description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years;
8. Certification signed by the appropriate Safety-Kleen representative;
9. Additional reporting as required in 20.4.1.500 NMAC (incorporating 40 CFR 264.77) shall be accomplished if releases, fires and explosion occur at the Facility or if the Facility closes.

8.9 INCIDENT REPORT

Incident reports shall be submitted to NMED as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.56(j)).

8.10 SHIPMENT OF GENERATED WASTE

When a shipment of hazardous waste is initiated from the Facility, the Branch Manager or designate shall;

1. Prepare a manifest before transporting the waste off-site;
2. Designate on the manifest, one facility, which is licensed to handle the waste described on the manifest. The Branch Manager may also designate on the manifest one alternate facility which is licensed to handle the

waste if an emergency prevents delivery of the waste to the primary designated facility;

3. Use a transporter who is properly licensed under RCRA or a generator owned vehicle licensed under RCRA to transport the waste;
4. If the transporter is unable to deliver the hazardous waste to the designated facility or the alternate facility, the generator shall either designate another facility or instruct the transporter to return the waste.

The Branch Manager shall use a manifest form as specified in 20.4.1.300 NMAC (incorporating 40 CFR 262 Subpart B), which contains all of the following information:

1. A manifest document number;
2. The generator's name, mailing address, telephone number, and EPA identification number;
3. The name and EPA identification number of each transporter;
4. The name, address, and EPA identification number of the designated facility and an alternate facility, if any;
5. The description of the waste required by regulations of the DOT in the provisions of 49 CFR 172.101, 172.202, and 172.203;
6. The total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle;
7. The hazardous waste number describing the waste;
8. The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations" and the applicable large quantity generator or small quantity generator statement in Block 16 of the Uniform Hazardous Waste Manifest; and

9. Other certification statements required by the director based on requirements under title II of the Solid Waste Disposal Act.

If the facility manifests a shipment of hazardous waste out of state, and if the state to which the shipment is manifested requires the use of another manifest, then the generator shall use that manifest.

The Branch Manager or designate shall do all of the following when initiating a shipment:

1. Sign the manifest certification by hand;
2. Obtain the handwritten signature of the initial transporter and the date of acceptance on the manifest;
3. Retain one copy for his files;
4. Give the remaining copies to the transporter.

When Safety-Kleen receives or ships hazardous waste, the Branch Manager or designate must review the manifest and check the information on the manifest for correctness. It should be noted that the Safety-Kleen computer-prints most of the required information on the majority of its manifests. The employee checking the manifest must review the names, addresses, EPA and New Mexico I.D. and transporter numbers, the manifest document number and the telephone numbers listed. In addition, the hazardous material (HM) box should be checked, the waste description, DOT classification, DOT I.D. number and EPA Waste Code must be verified. The number of drums and pounds, as well as the symbols for these units must be correct. The generator, transporter(s) and TSDF operator must all print and sign their names and enter the date the waste was shipped or received, as appropriate.

ATTACHMENT 9 PERSONNEL TRAINING

9.1 INTRODUCTION

The purpose of training is to familiarize employees with environmental regulations, records and emergency procedures so they can perform their jobs in the safest and most efficient manner possible. The training program is designed to ensure that Facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems.

Facility personnel shall successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the Facility's compliance with 20.4.1.500 (incorporating 40 CFR 264.16).

Facility personnel shall successfully complete the program outlined in this Attachment within six months after the date of their employment, or assignment to a facility, or to a new position at a facility. Employees shall not work in unsupervised positions until they have completed the training requirements of this Attachment. The new employee training program is outlined in Attachment 9-1.

9.2 TIME OF TRAINING

| Job Title | Prior to Starting Work | On The Job | Annually | When Regulations or Procedures Change |
|-------------------------|------------------------------|------------|----------|--|
| Branch Manager | X | X | X | X |
| Branch Secretary | X | X | X | X |
| Branch Sales Mgr | X | X | X | X |
| Sales Representative | X | X | X | X |
| Warehouse Person | X | X | X | X |

9.3 TRAINING SUMMARY

The following describes the training and cycle of training received for each class of employee.

9.3.1 Customer Service Representative:

8-Hour HAZWOPER Refresher (Annual)

Bloodborne Pathogens (Annual)

Hazardous Materials Transportation Skills (Once every 3 years)

RCRA Update (Annual)

Driver Safety Training (including vehicle inspections and exempt log training - Once every 3 years)

Drum Closure (Once every 3 years)

9.3.2 Customer Service Representative: Oil and Vac:

8-Hour HAZWOPER Refresher (Annual)

Bloodborne Pathogens (Annual)

Hazardous Materials Transportation Skills (Once every 3 years)

RCRA Update (Annual)

Driver Safety Training (including vehicle inspections and exempt log training - Once every 3 years)

Drum Closure (Once every 3 years)

Cargo Tank Operations (Once every 3 years)

Rail Tank Car Procedures (Once every 3 years)

9.3.3 Material Handlers:

8-Hour HAZWOPER Refresher (Annual)

Bloodborne Pathogens (Annual)

Hazardous Materials Transportation Skills (Once every 3 years)

RCRA Update (Annual)

Drum Closure (Once every 3 years)

9.3.4 Secretaries:

8-Hour HAZWOPER Refresher (Annual)
Bloodborne Pathogens (Annual)
Hazardous Materials Transportation Skills (Once every 3 years)
RCRA Update (Annual)
Shipping Hazardous Material Samples (Annual)

9.3.5 Branch General Manager:

8-Hour HAZWOPER Refresher (Annual)
Bloodborne Pathogens (Annual)
Hazardous Materials Transportation Skills (Once every 3 years)
RCRA Update (Annual)
Drum Closure (Once every 3 years)
Cargo Tank Operations (Once every 3 years)
Rail Tank Car Procedures (Once every 3 years)

9.4 TRAINING CERTIFICATION AND RECORD RETENTION

Records documenting that the training specified in this Attachment or job experience required in accordance with 40 CFR 264.16(a) through 40 CFR 264.16(c), shall be maintained and kept at the Facility as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.16(d)(4)).

Training records on current personnel shall be kept until Facility closure; training records on former employees shall be kept at least three years from the date the employee last worked at the Facility. Personnel training records may accompany personnel transferred within the same company in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.16(e)).

9.5 TRAINING RECORDS

Employee training will be documented. Employees complete a written examination at the conclusion of training. Training records will be maintained onsite in accordance with Section 9.4.

9.6 OUTLINE OF TRAINING PROGRAM

Each employee is trained to operate and maintain the Facility safely, and to understand hazards unique to the job assignment. This section contains information on Service Center personnel and trainers, job descriptions, training outlines and training record forms. The training is designed to meet federal regulations and requirements. All employees at the Facility have had training that satisfies the requirements of 20.4.1.500 NMAC (incorporating 40 CFR 264.16). The regional environmental professional directly assists with the training new branch managers. The Branch Manager, in turn, trains his or her employees. An employee shall not work in an unsupervised position until he or she has received proper training as outlined in this Attachment.

9.7 ORGANIZATION STRUCTURE AND JOB DESCRIPTIONS

Environmental compliance and training of Facility employees is the responsibility of the Branch Manager. The Safety-Kleen corporate office provides a training program to be executed annually. The training program is directed by personnel trained in hazardous waste management procedures and includes instruction on hazardous waste management for Facility personnel in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.16(a)(2)). Job descriptions for branch personnel as required by 20.4.1.500 NMAC (incorporating 40 CFR 264(d)(2)) are located in Attachment 9-2. In accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.16(d)(1)), a list of employees, their job titles, and job functions will be maintained at the Facility.

9.7.1 Branch Manager

The Branch Manager (which may include the resource recovery manager, branch sales manager, branch automotive manager or designee) is ultimately responsible for the operations at the service center. The sales representatives, secretary and material handlers report to the Branch Manager and he or she, in turn, shall provide the training and materials necessary for the branch employees to execute their duties. With respect to environmental compliance, the Branch Manager shall:

1. Keep the service center clean and orderly;
2. Perform, or designate an employee to perform, the daily inspection, keep a written log and remediate any identified problems;
3. Know the potential hazards of the material and wastes handled on site;

4. Identify potential spill and fire sources and be able to execute the contingency plan;
5. Inform all employees of their environmental responsibilities;
6. Act as Emergency Coordinator and notify the proper authorities during an emergency, remediate the situation to the best of his or her abilities, and submit necessary reports to the corporate office; and
7. Maintain all environmental records (such as manifests, training records and spill reports) at the service center.

9.7.2 Corporate Compliance Department

Safety-Kleen's Corporate Compliance Department has personnel on staff who provide guidance to divisional and regional personnel for training, permitting, and other compliance issues for the service centers in a given geographic area of the country.

9.8 DESCRIPTION OF THE TRAINING PROGRAM

Employee training may be accomplished using classroom, videotape, written, and on-the-job methods. This training is sufficient to allow the Branch Manager to train his or her employees. The regional/corporate offices prepare a training program for employees, and documents that the program has been executed.

An employee is trained prior to starting or as soon as he or she begins working (depending on the specific position), and annually thereafter. Safety-Kleen ensures that the Branch Manager has received adequate training in order to train branch personnel. Section 9.3 of this Attachment contains an example outline of the training program, which demonstrates that Facility personnel are trained in Hazardous Waste Management procedures.

9.8.1 Training of New Branch Managers

New managers are trained for several weeks before they begin their new positions. This training includes on site, on-the-job, and off site classroom training. While being trained at a designated "training facility", a new manager reviews all environmental records and learns the record keeping requirements. These records may include Waste Analysis Profiles, manifests, personnel records, training records, facility inspection records, and spill reports.

The training culminates with additional training at his or her new facility at the direction of an environmental professional. This training may include at a minimum, a review of the Facility permit, including the Waste Analysis Plan, Inspection Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan and Closure Plan. Additional time is spent reviewing past environmental compliance at the branch manager's facility and regulations unique to his or her state are discussed as well.

9.8.2 Training of New Branch Secretaries

Branch Secretaries are trained in the proper record keeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they must check it for accuracy and completeness and then process or file it as required. Additional training is overseen by the Branch Manager and is done within six months of starting. It includes the items listed in the training outline located in Attachment 9-1. and may include emergency response, shipping documents (including manifests), drum labels and other safety and environmental compliance issues.

9.8.3 Training of Sales Manager

A Branch Sales Manager is a middle management position created to supervise the sales force within a specific line of services. The sales manager position will be particular to a specific line of Safety-Kleen business and will be filled according to the needs of the Facility. The primary goal of this position is to direct and assist the branch manager in attaining sales goals in a specific line of business, which Safety-Kleen offers. The sales manager supervises the sales aspect of the sales representative position. Though most training for this position is within the area of sales the sales manager also receives the training included in the training outline in Section 9.3. A sales manager may also be trained as the designate for performing facility inspections. Additional training in the form of a review of the contingency plan with the branch manager is required. A job description for this position can be found in Attachment 9-2.

9.8.4 Training of New Sales Representatives

New Sales Representatives are trained on site during which they are introduced to manifests, facility inspection records and training records. A sales representative may also be trained as the designate for performing the Facility inspection. Additional training may be in the form of videotape presentations and a review of the Contingency Plan. The Contingency Plan must be reviewed with the Branch Manager before the sales representative

formally begins his new position and annually thereafter. All items listed in the training outline located in Section 9.3 shall be explained within six months of starting.

9.8.5 Training of New Material Handlers

A Material Handler is trained to maintain the service center and assist the other branch employees in their tasks. He or she may be a designate for the Facility inspection and shall be trained by the Branch Manager (or designate) as such. Within two weeks, the Branch Manager (or designate) must review the Contingency Plan with the Material Handler, and within six months the Material Handler must review the items listed in the training plan outline located in Section 9.3.

9.8.6 Annual Training

On an annual basis, employees are trained using a program prepared and updated annually by the Safety-Kleen regional and or corporate compliance offices and health and safety department offices. The annual training includes updates on environmental regulations, an in-depth review of the Contingency Plan and a review of RCRA inspection criteria.

Service center employees shall annually review the items listed in the example training plan outline. This review is in the form of slide/tape and or videotapes and a review and discussion of the storage Facility permit application. In addition, periodic memoranda on changes in environmental regulations are issued by the regional and or corporate offices and must be read and discussed by branch personnel.

ATTACHMENT 9-1
NEW EMPLOYEE TRAINING PLAN

ATTACHMENT 9-2
BRANCH PERSONNEL JOB DESCRIPTIONS

ATTACHMENT 10
CLOSURE PLAN**10.1 INTRODUCTION**

Location address:

Safety-Kleen Systems, Inc. (7-008-01)

2720 Girard Boulevard NE

Albuquerque, New Mexico 87107

U.S. EPA I.D. NO: NMD 000804294

Waste Units to Undergo Closure:

1. Tank Storage - one 12,000-gallon underground storage tank used to store used parts washer solvents.
2. Drum Storage - an area of approximately 350 square feet with a storage capacity of 2,680 gallons (East CSU) with secondary containment of 268 gallons, and an area of about 900 square feet with a storage capacity of 4,310 gallons (West CSU) with secondary containment of 431 gallons.
3. Return and Fill Station - This waste management unit is used to transfer wastes to the used parts washer solvent tank. It has a containment capacity of approximately 350 gallons but typically operates at 30 gallons per dumpster/drum washer.
4. Flammable Storage Building - The location of this waste management unit is shown on the Site plan. It has a storage capacity of 9,650 gallons with secondary containment of 965 gallons.

The Albuquerque service center operates as a storage facility for hazardous wastes. The solid waste management units (SWMUs) shall be closed in accordance with the closure requirements of 20.4.1.500 NMAC (incorporating 40 CFR 264.110 through 40 CFR 264.115). Closure of the Facility shall be carried out in accordance with this plan. An itemized schedule and closure cost estimate are located in Attachment 10-1. The Closure Plan, as part of the Permit, shall be kept on site.

The Safety-Kleen corporate environmental department is responsible for revising, updating and distributing copies of the Closure Plan. Safety-Kleen will remove all hazardous wastes and

residuals from the facility to a level that is protective of human health and the environment will therefore eliminate the need for further maintenance and care. The facility is expected to close in the year 2020.

At the beginning of closure, or before, the waste shall be removed and transported to disposal facilities using the same procedures and practices that are employed in Safety-Kleen's day-to-day business. A sampling plan listing the areas and procedures to be used for testing the Facility during closure activities is included in this Permit Attachment.

10.2 PURPOSE

The Safety-Kleen Facility shall continue to be operated as long as it is deemed economically viable.

However, when the Facility is closed, there shall be no partial closures.

Safety-Kleen shall remediate any hazardous wastes from the Facility to a level that is protective of human health, the environment, and is approved by the Secretary. Upon completion of closure activities, the need for further maintenance will be minimized or eliminated.

Once all of the wastes are removed from the Facility, a soil gas survey or the latest proven technology being used at the time to detect organic substances shall be used. The survey shall be performed in the vicinity of the CSUs, at specified areas below the concrete floor of the CSUs, at the return and fill station, in the sumps, in the area around the 12,000-gallon underground storage tank, and any other areas where there is known to have been a spill of any organic solvent or hazardous waste.

In areas where corrosive wastes and products may have been stored, corings shall be done at several places in each storage area. A pH test shall be conducted on each concrete sample and the soil beneath it, to determine if further investigation is warranted. The pH shall be obtained by adding de-ionized water to the sample and the result shall be taken from the liquid. If a more current method of detecting corrosives is available at the time of closure, that method shall be used instead of the one described in the current paragraph.

Random sampling of soil for background levels in the surrounding area shall be conducted during the closure process in order to determine the action levels for pH. Sample procedures shall comply with the U.S. EPA's SW-846, *Test Methods for Evaluating Solid Waste - Physical and Chemical Methods*, and its updates. If

the pH levels from any area are out of the background screening action range, further investigation shall be conducted. All survey samples shall be sent to a qualified contract laboratory with proper quality assurance/quality control (QA/QC) procedures in place available at time of closure of the Facility.

If the analysis of the samples described above reveals any areas of contamination, both the concrete and soil shall be excavated in the area of concern, analyzed and disposed of in an appropriate manner and the area closed in place as a landfill if Safety-Kleen cannot clean-close the area.

When Safety-Kleen decides to close the Facility, notices shall be sent to generators employing Safety-Kleen's services to inform them of the pending discontinuation of receiving their waste and materials. The New Mexico Environment Department shall be informed at least 60 days prior to the date that final closure is expected to begin. All hazardous wastes shall be removed from the site within 90 days of receipt of the final volume of waste and the closure activities shall be completed within 180 days.

10.3 NOTIFICATION OF CLOSURE

Safety-Kleen will notify the Department in writing of any intent to close the facility. The Department will receive notification 45 days before Safety-Kleen begins full facility closure.

Safety-Kleen will submit the names of the contractor(s) who will clean and decommission the permitted units prior to commencing closure activities.

10.4 CLOSURE SCHEDULE

The following schedule is proposed for final closure of the Facility after receiving the final volume of hazardous wastes:

1. Removal of all remaining wastes to a treatment, storage, and disposal facility - (Days 0-90);
2. Soil gas survey, concrete coring, sampling and analysis performed - (Days 90-120);
3. Contingency for excavating, sampling, analyzing and removal of contaminated soil and concrete from site - (Days 120-170);
4. Site closure complete - (Day 180)

10.5 CERTIFICATION OF CLOSURE

A certification that the Facility has been closed shall be sent by registered mail or hand delivered to NMED within 60 days of the completion of final closure activities. The owner of Safety-Kleen and a professional engineer registered in the State of New Mexico shall sign the certification as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.115).

10.6 SURVEY PLAT

Safety-Kleen shall provide a survey plat of the Facility to all local zoning authorities acknowledging closure of the Facility as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.116).

10.7 CLOSURE PLAN AMENDMENTS

If an amendment needs to be made to the current Closure Plan, Safety-Kleen shall submit a written notification or request to the Secretary for a permit modification. It should therefore be noted that the Sampling Plan presented below is only an example, because as operations within the Facility and testing procedures and requirements change, so shall Safety-Kleen's sampling plan through Permit Modifications, reflect these changes.

10.8 SAMPLING PLAN

The following is Safety-Kleen's Sampling and Analysis Plan (SAP) that shall be implemented during closure of the Facility. All sampling procedures shall follow EPA and NMED protocols incorporating SW-846 methods or equivalent methods approved by the Secretary to ensure proper handling of samples including proper QA/QC procedures.

10.8.1 Sampling Objectives:

One of the objectives of soil sampling at closure shall be to identify "hot spots" in the Facility that comprises the 12,000-gallon underground storage tank, the return and fill station, the three CSUs, and any other areas. Sampling shall determine if there is any contamination in the soil by the RCRA metals soil sampling results, volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs), and if the soil pH level is within the background standards. Background levels shall be determined by taking soil samples from near by areas that have not been impacted by the hazardous waste management, storage and related activities (e.g., loading/unloading) within 180 calendar days from the date the renewed Permit becomes effective.

10.8.2 Underground Tank and Associated Piping

To safely clean and decontaminate the underground storage tank (one 12,000-gallon used parts washer solvent tank), the following activities shall be performed during final closure (as appropriate):

1. Remove the remaining material from the tank and send the materials to a recycle center, reclaimer or other permitted treatment/disposal facility;
2. Provide access to the tank undergoing closure or decontamination;
3. Pressure wash with detergent solution, scrape, squeegee (if necessary) and triple rinse the tank interior, removing all residual waste material and rinsate. Sample rinsate for confirmation that all contamination was removed;
4. Disconnect and decontaminate all appurtenant piping and pumping equipment;
5. Excavate and remove tank. Dispose of any impacted soils off site in accordance with this Permit;
6. Visually inspect the tank and appurtenant piping, equipment or underlying surfaces for evidence of leakage (i.e., staining and residue);
7. Remove tank, piping and appurtenant equipment for offsite reuse or sell as scrap if decontaminated;
8. Backfill tank excavation with clean fill;
9. Transport and properly dispose or treat waste material generated (rinsate) during closure in accordance with this Permit.

During closure of the tank system, Safety-Kleen shall remove or decontaminate waste residues, contaminated system components, contaminated soils, structures and equipment contaminated with waste, and manage these materials as hazardous waste, unless determined to be non-hazardous. The procedures for tank decontamination final closure are described below.

10.8.3 Removal of Waste Material and Opening of the Tank

The contents of the tank shall be removed using a pump, vacuum or similar equipment and then be shipped to a recycle center, reclaimer or other permitted treatment/disposal facility. To

gain access to the underground tanks use the manway. Depending on the type of opening and the condition of the equipment, a variety of tools may be used to open the manway. Care must be exercised to minimize spark generation when working on the tank.

Storage tanks are considered confined spaces (i.e. spaces open or closed having a limited means of egress in which poisonous gases or flammable vapors might accumulate or an oxygen deficiency might occur), and confined space entry requires special procedures. Confined space entry will be conducted in accordance with 29 CFR 1910.146. Tank entry procedures will be specified in the site health and safety plan prepared for use during closure activities. In all cases, personnel performing closure activities will have completed 40-hour OSHA hazardous waste training requirements (29 CFR 1910.120).

Prior to entering the tank, personnel will have appropriate protective respiratory equipment and clothing. Once the tank has been opened, it must be provided with positive ventilation. The tank will then be inspected to determine the approximate quantity and physical conditions of any residual waste material, as well as the integrity of the tank system.

Procedures for purging or venting tanks are described in API, RP1604 "Removal and Disposal of Used Petroleum Storage Tanks" and OSHA "Permit Required Confined Spaces" (29 CFR 1910.146). The contractor will monitor vapors to ensure the tank atmosphere has combustible gas concentrations of less than 10% of the lower explosive limit (LEL).

10.8.4 Removal of Residual Waste and Cleaning of Tank

The method used to remove the residual waste material from the tank will depend on the physical properties and quantities of that material. Prior to any person entering the tank, an effort will be made to remove as much liquid and sediment as possible (see section 10.8.3).

Before removing any residual waste from the tank, all piping and appurtenant equipment will be flushed with clean solvent followed by a detergent solution and triple rinsed. Subsequent to vacuuming the majority of the material from the tank, the tank interior will be washed using a high-pressure wash system and a detergent-water solution to decontaminate the walls, roof, and floor of the tank. The tank interior will then be rinsed with tap water. The wash/rinse water will be collected and shipped to a recycle center, reclaimer or other permitted treatment/disposal facility. The quantity of wash/rinse water will be kept to a minimum to limit the amount of waste material.

10.8.5 Removal of the Tank

Following removal of wastes and decontamination activities, the tank will be excavated and removed to an offsite location, or scrapped. The following procedures will be observed to safely remove the tank:

1. Disconnect all appurtenant piping.
2. Disconnect all appurtenant pumping equipment.
3. The tanks and piping shall be removed, cut up and transported to a scrap metal facility for recycling. The tank and piping will be recycled in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 261.1(c)(6) and (7)). Verification of destruction will be provided by the contractor or scrap metal facility;
4. Soil samples shall be collected from the bottom of the tank excavation. Soil samples will be analyzed for waste constituents representative of the waste codes for the tank system (i.e., D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043) in accordance with EPA Method SW-846. If constituents are present above applicable risk-based standards or soil screening levels, a work plan shall be developed to determine the extent of contamination and proper remedial action.
5. If the tank is to be reused following decontamination, the final rinsate will be sampled. The rinsate sample will be analyzed for volatile and semi-volatile organic compounds. If the total volatile organic compound concentration is less than 1 mg/L, the tank will be considered properly decontaminated. If the results are greater than 1 mg/L, the decontamination procedures shall be re-performed;
6. Backfill the excavation with clean fill materials and grade to ground level.

10.9 CONTAINER STORAGE AREAS

The container storage areas are used for the storage of containers of used immersion cleaner, dry cleaning waste, aqueous cleaning solvents, paint waste, dumpster sediment and other non-regulated wastes or products. The flammable storage area is used for storage of flammable materials for which Safety-Kleen is a

transporter only (paint and solvent, for example). At closure, all the contents of the containers will be removed and transported to an appropriate permitted hazardous waste management facility after proper packaging, labeling and manifesting. The contents of the drums will be reclaimed and the drums cleaned for reuse.

The concrete floors and containment trenches of the three container storage areas will be high-pressure cleaned with a detergent-water solution and triple rinsed with tap water. The final rinse will be sampled and analyzed for volatile organic compounds (VOCs) to determine the effectiveness of the cleaning. If the VOC level is less than 1 mg/L, the container storage areas will be considered properly decontaminated. If the results are greater than 1 mg/L, the decontamination procedures will be re-performed. All rinse wastes from the container storage area closure process will be reclaimed or properly treated at a permitted facility.

10.9.1 Concrete Floors

Any concrete stains that appear to indicate surface contamination shall be removed utilizing the best available technology at the time (bioremediation, scraping, or washing the floor). If the contamination cannot be removed, the concrete shall be analyzed for the following constituents or using equivalent methods approved by the Secretary:

1. Total Metals, using EPA Methods 1311, 200 series and 6000 series;
2. Volatiles, by EPA Method 8260B;
3. PCBs, using EPA Method 8082; and
4. pH using EPA Method 9045C.

If analytical results reveal that portions of the concrete are contaminated, the concrete shall be removed utilizing the best available technology at the time. The concrete shall be disposed of at an appropriate TSDF. The amount of concrete to be removed shall be determined by the grid sampling performed. If the sample in a certain grid is found to be contaminated, all the concrete in that grid shall be removed.

Following decontamination of the three CSUs, an independent registered Professional Engineer will inspect the areas. The inspection will document any potential lapses of integrity that may have allowed potential migration of wastes outside the containment areas. In the absence of any waste related staining

and/or lapses of integrity, further evaluation of the potential for wastes to impact human health or the environment will not be necessary.

10.9.2 Soils under the Concrete Floors

If soil sampling is necessary as required by Section 10.11, soils that are determined to be contaminated with hazardous waste shall be removed by the best available technology. Confirmation samples shall be taken from each excavated area and analyzed for the following parameters or using equivalent methods approved by the Secretary:

1. Total Metals, using EPA Methods 1311, 200 series and 6000 series;
2. Volatiles, by EPA Method 8260B;
3. pH, by EPA Method 9045C.
4. PCBs, EPA Method 8082

Soils that are determined to be contaminated shall be removed and disposed of at an appropriate TSDF or remediated utilizing the best available on-site technology.

10.9.3 Surrounding Soils

Safety-Kleen shall obtain background samples from the surrounding area that has not been impacted by hazardous waste storage activities, to establish screening action levels for selected contaminants within 180 calendar days from the effective date of this Permit. If during closure the samples from the Facility are out of the ranges established, further investigation shall be done. During closure, Safety-Kleen shall perform a gas survey on the remaining portions of the Facility. The area within the fence line shall be divided into grids. The gas survey shall show any volatile and semi-volatile contamination. Safety-Kleen shall retrieve several composite samples to perform analytical data.

10.9.4 Analytical Data/Results:

Safety-Kleen shall submit the results of all analyses performed under this sample Closure Plan to NMED for evaluation and final determination on the closure of the Facility.

10.9.5 Flammable Storage Building

The Flammable Storage Building is used to temporarily store containers of paint waste, dumpster sediment, used solvent, other flammable materials and/or products. At closure, residual waste will be removed from the building and shipped to a Safety-Kleen recycle center or contract reclaimer.

10.10 SOLVENT RETURN AND FILL STATION

The return and fill station is used to collect and return the used solvents to the underground waste storage tank. At closure, the sediment in the dumpsters/drum washer will be removed, containerized, labeled, manifested for proper treatment and then shipped to a Safety-Kleen recycle center, contract reclaimer or other treatment/disposal facility.

The dumpster/drum washers and the dock area will be thoroughly washed with a detergent solution and high-pressure spray, then triple rinsed. The rinsate may be discharged through the appurtenant piping system into the storage tank, which will be subjected to a separate closure procedure as described earlier. Alternately, the wash/rinse water may be collected in a vac truck or similar and placed in containers.

The clean drum washers/dumpster and dock area will be staged for reuse or scrapped. Wastes generated during closure of the return and fill structure will be transported to a permitted hazardous waste facility.

If components of the return/fill station will be reused, (e.g., drum washers) a sample of the final rinsate will be collected from each of the units intended to be reused. The rinsate sample will be analyzed for volatile organic compounds (VOCs). If the total VOC concentration is less than 1 mg/L, the components will be considered properly decontaminated. If the results are greater than 1 mg/L, the decontamination procedures will be re-performed. Should the components of the return/fill station be managed as scrap metal, rinsate samples will not be collected/analyzed. The contractor or scrap metal facility will provide a certificate of destruction.

Following decontamination and removal of the return/fill station, the underlying concrete slab shall be inspected by a New Mexico registered professional engineer for signs of potential lapses of integrity. If lapses of integrity are found during the inspection (i.e., through-going or unsealed cracks) that may have allowed potential migration of wastes outside the containment area, soil samples will be collected from immediately beneath the cracked areas and analyzed for constituents representative of the

waste codes listed in Permit Attachments 2 and 3. If any constituents are detected at levels above appropriate risk-based standards or NMED soil screening levels, a work plan shall be prepared to determine the extent of impacts and possible remedial actions.

10.11 SOIL SAMPLING

If the results of the SWMU inspections indicate a lapse of integrity in any of the secondary containment systems, or if any releases to the surrounding soils occurred that may have allowed the potential for waste to migrate to underlying soils, a detailed soil sampling program as approved by the Secretary shall be initiated in those potentially effected areas.

If lapses of integrity are found that may have allowed wastes to migrate to underlying soils, soil samples shall be collected every 5 feet along the length of an identified crack or gap or from immediately beneath the areas identified by an independent registered Professional Engineer. If the tank secondary containment is removed, soil samples will be collected from areas that exhibit waste-related staining if present.

If the inspections indicate no lapses of integrity, confirmatory soil samples shall be taken in accordance with the following closure soil sampling locations in the Facility to ensure no contamination has migrated to the surrounding soils.

1. Tank Area: A minimum of two soil samples will be collected from beneath the tanks. A New Mexico registered professional engineer shall select the actual sample locations;
2. Return and Fill: A minimum of two soil samples will be collected from beneath the return/fill station containment area. One soil sample will be collected from the lowest point (sump) and one sample will be collected under the drum washer unit. A New Mexico registered professional engineer shall select the actual sample locations;
3. Container/Drum Storage Areas: A minimum of two soil samples each will be collected from the East and West Container Storage Areas. A New Mexico registered professional engineer shall select the sample locations;
4. Flammable Storage Building: A minimum of two soil samples will be collected under the Flammable Storage

Building. A New Mexico registered professional engineer shall select sample locations.

If determined to be necessary based on the inspections of the SWMUs, soil samples shall be collected from immediately beneath the tanks, return and fill station, or CSUs. Soil samples shall be analyzed for VOCs and RCRA metals in accordance with SW-846. If hazardous constituents are detected, the concentrations may be compared to appropriate risk-based screening levels to determine whether the SWMU(s) may be closed.

A coring device or jackhammer shall be used to remove concrete and expose underlying soil. Soil samples will be obtained with a hand auger or other appropriate sampler lined with stainless steel or brass sleeves. The soil samples will be retrieved from immediately below the bottom of the concrete to a depth of approximately six inches, using the procedures outlined in ASTM D 1452-80 "Standard Practice for Soil Investigation and Sampling by Auger Borings" or equivalent. Hand auger and equipment used for sample collection will be decontaminated prior to and between sampling events. The decontamination/rinse water will be collected, managed as a hazardous waste and transported off-site for disposal at a permitted waste management facility.

The soil samples collected will be analyzed for constituents that are at a minimum, representative of the waste codes for which the units were permitted.

Analytical results from soil sampling will be forwarded to NMED. The analytical results from the soil samples will be compared to appropriate closure criteria and background data. Should the analytical results verify that no constituents were detected at levels above appropriate closure criteria, a Closure Certification Report will be submitted at the conclusion of the closure activities. If the analytical results of investigative samples exceed appropriate closure criteria, Safety-Kleen will prepare a remedial action plan/closure plan amendment to determine the extent of subsurface impacts. Subsequent remedial action plan/closure plan amendments will address a plan to remediate subsurface impacts to levels that are protective of human health and the environment, thereby achieving clean closure. A risk assessment may also be performed to further evaluate the analytical results and need for additional remediation to achieve clean or risk-based closure. If performed, the risk will be conducted according to EPA guidance. The risk assessment results will be used to develop alternate clean closure objectives with NMED.

10.12 FACILITY CLOSURE SCHEDULE AND CERTIFICATION

Within 90 days of receiving the final volume of hazardous wastes, Safety-Kleen shall remove all hazardous wastes from the site in accordance with the approved closure plan. The Secretary may approve a longer period if Safety-Kleen demonstrates that the activities required to comply with this paragraph will, of necessity, take longer than 90 days to complete or the following requirements are met:

1. The facility has the capacity to receive additional wastes;
2. There is a likelihood that a person other than Safety-Kleen will recommence operation of the site; and/or
3. Closure of the facility is incompatible with continued operation of the site. In this case, Safety-Kleen will take all steps necessary to prevent threats to human health and the environment.

Safety-Kleen shall complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes. When closure is completed, Safety-Kleen shall submit to NMED certification, both by the operator and by an independent New Mexico registered professional engineer, that the facility has been closed in accordance with the approved closure plan and 20.4.1.500 NMAC (incorporating 40 CFR 264.115).

10.13 POST-CLOSURE CARE PLAN

Based upon Safety-Kleen's procedures, continuous monitoring and policies that are in place, including the fact that any spills or leaks be cleaned up at the time of the incident, there is anticipated to be a very minimal post-closure care period. Upon completion of closure activities at the Facility, Safety-Kleen shall present a certification of Closure to the Secretary. After complete closure of the Facility, subsequent use of the property shall be for non hazardous waste warehouse operations.

In the event that contamination cannot be removed, or the clean up standards cannot be met, Safety-Kleen will submit an amendment to the closure plan to include a post-closure plan. The post-closure plan will be submitted within 90 days of the determination that contamination cannot be removed or clean up standards cannot be met

ATTACHMENT 10-1
CLOSURE SCHEDULE AND ESTIMATED CLOSURE COSTS

ATTACHMENT 11

CORRECTIVE ACTION UNITS

11.1 INTRODUCTION

There are five (5) Corrective Action Management Units or Areas of Concern (AOCs) at the Safety-Kleen Facility. These include the West Container Storage Area, the East Container Storage Area, the Flammable Storage Building (CSUs), the 12,000-gallon underground spent solvent storage tank, and the return and fill station, which are described in the following paragraphs. The Site Plan located in Attachment 1-1 shows the location of the subject Areas of Concern.

11.1.1 East Container Storage Area

This area comprises an area of approximately 350 square feet. The East CSU is used for the storage of spent immersion cleaner, aqueous parts washer solvents, and dry cleaning waste. Non-hazardous material, wastes that are not regulated under RCRA (including transfer wastes), and Safety-Kleen products may also be stored in this area. The wastes stored in the East CSU are not handled while on site, are segregated, and are labeled to indicate their contents.

The East container storage unit is also equipped with secondary containment sized to contain 10% of the volume of containers in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.175(b)(3)).

There has been no release of hazardous materials or wastes to report at the East CSU.

11.1.2 West Container Storage Area

This area comprises an area of approximately 900 square feet. The West CSU is used for the storage of spent immersion cleaner, aqueous parts washer solvents, dry cleaning waste, and photo imaging wastes. Non-hazardous material, wastes that are not regulated under RCRA (including transfer wastes), and Safety-Kleen products may also be stored in this area. The wastes stored in the West CSU are not handled while on site, are segregated, and are labeled to indicate their contents.

The West container storage unit is also equipped with secondary containment sized to contain 10% of the volume of containers in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.175(b)(3)).

There has been no release of hazardous materials or wastes to report at the West CSU.

11.1.3 Flammable Storage Building

This area comprises an area of approximately 1,240 square feet. The Flammable Storage Building is used for the storage of dumpster sediment, paint wastes, aqueous parts washer solvents, and other flammable wastes or products. The wastes stored in the Flammable Storage Building are not handled while on site, are segregated, and are labeled to indicate their contents.

The Flammable Storage Building is also equipped with secondary containment sized to contain 10% of the volume of containers in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.175(b)(3)).

There has been no release of hazardous materials or wastes to report at the Flammable Storage Building.

11.1.4 12,000-Gallon Spent Solvent Underground Storage Tank

The 12,000-gallon underground spent solvent storage tank is 8' in diameter and 32.5' in length. It is constructed of 1/4" thick carbon steel and is double-walled with a leak detection system installed in the interstitial space.

The spent solvent underground storage tank is equipped with an audible siren and visual strobe light high level alarm system which will alert personnel when the tank is 600 gallons (95%) from being full.

11.1.5 Return and Fill Station

Ancillary equipment to the spent solvent underground storage tank includes a return and fill shelter containing two enclosed dumpster/drum washers into which the contents of a drum of used solvent can be emptied. The return and fill station is concrete block structure with a metal roof and is equipped with a monolithically poured concrete secondary containment with a capacity of 1,548 gallons. Elevated grating is situated above the containment area.

Piping to the underground storage tank from the return and fill station is tight-piped, underground, and the joints are welded to minimize the potential for leaks. The underground used solvent piping is provided with secondary containment in the form of a high-density polyethylene pipe jacket.

ATTACHMENT 12
FINANCIAL ASSURANCE

12.1 FINANCIAL ASSURANCE

Attachment 12-1 contains a copy of the Closure Insurance Agreement and the Certificate of Liability Insurance, which demonstrate Safety-Kleen's financial assurance. This information was submitted to the New Mexico Environment Department, Hazardous Waste Bureau by Safety-Kleen, in accordance with the requirements of the New Mexico Hazardous Waste Management Regulations 20.4.1.900 NMAC (incorporating 40 CFR 270.14(b)(17)), and 20.4.1.500 NMAC (incorporating 40 CFR 264 Subpart H, Financial Requirements).

ATTACHMENT 12-1

FINANCIAL ASSURANCE AND CERTIFICATE OF LIABILITY